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DEPARTMENT OF ENVIRONMENTAL PROTECTION

LAND USE MANAGEMENT

WATER MONITORING AND STANDARDS

Surface Water Quality Standards N.J.A.C. 7:9B

Adopted Amendments: N.J.A.C. 7:9B-1.15

Proposed:	November 18, 2002 at 34 N.J.R. 3889(a)
Adopted:	April 22, 2003 by Bradley M. Campbell, Commissioner, Department of Environmental Protection
Filed:	April 28, 2003 with portions of the proposal not adopted at this time.
Authority:	N.J.S.A. 58:10A-1 <u>et seq.</u> , 58:11A-1 <u>et seq.</u> , and 13:1D-1 <u>et seq.</u>
DEP Docket Number:	28-02-10/347
Effective Date:	May 19, 2003
Expiration Date:	April 17, 2005

The Department of Environmental Protection (Department) is adopting amendments to the Surface Water Quality Standards proposed on November 18, 2002 at 34 N.J.R. 3889(a). The adopted amendments upgrade the antidegradation designations for fifteen waterbodies from Category 2 to Category 1. The comment period for this proposal closed on February 17, 2003. Public hearings regarding this proposal were held on December 10, 2002 at County Administration Building, New Brunswick, New Jersey and on December 18, 2002 at the Department of Environmental Protection, Trenton, New Jersey. Debra Hammond, Chief of the Bureau of Water Quality Standards and Assessment served as the hearing officer at both the hearings. A total of 43 people presented oral comments. The Department also received approximately 9000 post cards supporting the rule proposal at the December 10, 2002 public hearing.

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After reviewing the Summary of the public comments and Agency responses, Debra Hammond, Chief of the Bureau of Water Quality Standards and Assessment recommended that the amendments to N.J.A.C. 7:9B-1.15 be adopted.

The records of the public hearings are available for inspection in accordance with applicable law by contacting:

Gary J. Brower, Esq.

Attn. DEP Docket Number 28-02-10/347

Office of Legal Affairs

New Jersey Department of Environmental Protection

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Summary of Hearing Officer's Recommendations:

The Department proposed amendments to the Surface Water Quality Standards (SWQS) at N.J.A.C. 7:9B to upgrade the antidegradation designations for fifteen (15) waterbodies from Category Two (C2) to Category 1(C1) to provide enhanced protection, definitions for bioaccumulation factor and bioconcentration factor, and MA90CD10, wildlife criteria with the applicable design flows.

The Department is adopting amendments to upgrade the antidegradation designations for fifteen waterbodies from Category 2 to Category 1. The Department is not adopting certain portions of the proposed amendments to the SWQS at N.J.A.C. 7:9B. The wildlife criteria proposed at N.J. A.C. 7:9B-1.14(c)13, the applicable design flow proposed at N.J.A.C. 7:9B-1.5(c)2, and the definitions at N.J.A.C. 7:9B-1.4 are not being adopted by the Department at this time.

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An interagency committee comprised of New Jersey Department of Environmental Protection (NJDEP), United States Environmental Protection Agency (USEPA), and United States Fish and Wildlife Service (USFWS) was assembled to derive New Jersey-specific wildlife water quality criteria for DDT and its metabolites, mercury, and PCBs that would minimize adverse effects of these pollutants on the bald eagle and peregrine falcon. The committee agreed to respond to any comments received regarding the proposed wildlife criteria. The Department received numerous comments regarding the technical aspects of these criteria. The Department has determined it is not necessary to delay the adoption of the Category 1 upgrades while the committee reviews the technical comments on the wildlife criteria. Therefore, the Department will adopt the proposed wildlife criteria, the applicable design flow, and the definitions later in 2003.

After reviewing the Summary of the public comments and Agency responses, Debra Hammond, Chief of the Bureau of Water Quality Standards and Assessment recommended that the amendments to N.J.A.C. 7:9B-1.15 be adopted.

Summary of Public Comments and Agency Responses:

The following people submitted written and/or oral comments on proposed amendments on Surface Water Quality Standards, N.J.A.C. 7:9B. The numbers in parentheses after each comment correspond to the number identifying commenters below.

LIST OF COMMENTERS IS AT THE END OF THIS DOCUMENT

COMMENT 1: Several commenters requested that the Department extend the comment period on the proposed amendments to the Surface Water Quality Standards. The commenters indicated that the proposed rules are technically complex, have the potential for far-reaching scope of impacts on development throughout the State of New Jersey, and are closely related to the Department's Stormwater Management rules which were proposed on January 6, 2003. The commenters requested additional time ranging from 60 days to 180 days. (870, 1081, 2218, 2520, 2919, 3015a, 3015b, 3115)

RESPONSE: On April 22, 2002, Governor James E. McGreevey announced that the State intended to strengthen water quality protections provided to six streams and nine reservoirs as the start of a broader initiative to provide New Jersey residents with clean and plentiful water. Governor McGreevey's announcement included the identification of each of the waterbodies to be proposed. These 15 "high quality waters" covered approximately 200 stream and reservoir miles. The Department also indicated its intent to upgrade Sidney Brook and South Branch Rockaway Creek, two of the waterbodies identified by Governor McGreevey, in response to rule petitions for Category 1 upgrades in a notice published in the New Jersey Register on October 21, 2002 (34 N.J.R. 3651). The Governor's Office issued a press release on October 21, 2002 announcing that Commissioner Campbell had signed the proposed regulation necessary to complete the upgraded antidegradation designation.

On December 9, 2002, early in the public comment period, the Department announced and posted on its website the proposed Stormwater Management rules, which included a single subsection concerning Category 1 waterbodies. These proposed amendments to the Surface Water Quality Standards initially provided for a sixty day comment period from publication of the proposal on November 18, 2002. The Department agreed to extend the public comment period an additional 30 days. The comment period closed on February 17, 2003, and the comment period on the proposed Stormwater Management rule closed on April 7, 2003. The Department believes there was sufficient opportunity to comment on each of the proposed rules.

General Support (1-132,134-183,185-308,310-317,319-485,487-633,635-676,678-680,682-785,787-797,799-815,817-869,871-877,879-934,936-986,988-1080,1082-1244,1246-1260,1262-1283,1285-1295,1297-1369,1372-1400,1402-1405,1407-1412,1415-1440,1442-2201,2203-2217,2219-2405,2407-2433,2435-2502,2504-2519,2521-2727,2729-2816,2818-2902,2904-2918,2920-3013,3016-3073,3075-3108,3110-3114,3116-3251,3253-3282,3284-3347,3349-3423,3426-3431,3433-3447,3449-3522,3524-3536,3538-3687,3689-3691)

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COMMENT 2: The commenters strongly support the measures, including the Department's efforts through the proposed Category 1 designations, to protect and improve water quality for the citizens of New Jersey. (677,1413)

COMMENT 3: Drinking water supplies and watersheds that provide critical habitat for Threatened and Endangered (T & E) species deserve the same high level of protection as trout streams.

(8,200,262,406,439,467,589,686,747,799,957,979,1080,1224,1479,1829,2116,2387,2465,2483, 2693,2706,2731,2823,2946,2947,2959,2962,3030,3038,3159,3211,3337,3451,3485).

COMMENT 4: The loss of forests directly threatens water supplies, as riparian buffers and filtering forests are replaced with parking lots and rooftops that compromise the quality and quantity of our water supplies. The proposed Category 1 designations would help protect the watershed areas that filter our drinking water from the effects of this wave of development. (687)

COMMENT 5: The commenter appreciates Governor James McGreevey and Commissioner Bradley Campbell taking a leadership role in proposing 15 waterways for Category 1 designation and the improvement in standards to protect State threatened and endangered wildlife. (3252)

COMMENT 6: The commenter would like to thank both Governor McGreevey and Commissioner Campbell for proposing these upgrades to the New Jersey Surface Water Quality Standards. These Proposed Amendments to the existing Standards must be viewed as long overdue and more specifically as a good first step to which there will be many more steps into this direction. (1370)

COMMENT 7: The commenters support the proposed amendments to upgrade the antidegradation designations of 15 water bodies from Category 2 to Category 1. (486,3432)

COMMENT 8: The commenter supports the Department's selection of the following 6 waterways for protection of threatened and endangered species and trout Assicunk Creek, Beaver

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Brook, Flatbrook/Walpack, Pequest Tributary, Sidney Brook and the South Branch of Rockaway Creek. (3252)

COMMENT 9: The commenters support the selection of Assiscunk Creek, due to its "exceptional water quality significance" and points out that it discharges to the Delaware Estuary, part of the National Estuary Program. (486,3432)

COMMENT 10: The commenters conduct a stream monitoring program throughout the Delaware Watershed. The commenters' data demonstrates that the Flat Brook shows exceptional quality and meets the criteria for Category 1 Waters for all four categories. Please note that wood turtle and trout were observed. (486,3432)

COMMENT 11: The Pequest River is a high quality river with a relatively large watershed that drains a mixed use of woodland, farms, and open land. Development pressures, however, require protection efforts in this vulnerable watershed that contributes a healthy flow to the Delaware River. The entire Pequest River should be considered for C-1 status based on the fact that this river must protect the existing high water quality of the receiving Lower Delaware Wild and Scenic River. (486,3432)

COMMENT 12: The commenter fully supports inclusion of the Glendola Reservoir into the Category 1 protection Standard. (1370)

COMMENT 13: The commenters generally support the Department's efforts to improve protection of reservoir water quality through application of Category 1 antidegradation policies to the Round Valley and Manasquan Reservoirs. The commenters also recognize that there is no driving need for Category 1 designation of Spruce Run Reservoir, as every influent stream to that reservoir is already Category 1. This situation does not hold for the other two reservoirs, and so Category 1 status will provide an upgrade in protection. (816,2443,3425)

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COMMENT 14: The commenter supports the listing of the Glendola Reservoir, the Manasquan Reservoir and the Swimming River Reservoir for Category 1 designation. Because each of these reservoirs is significantly replenished with water pumped from the Shark River, the Manasquan River and the flow from a number of tributary streams, it is recommended each of these “feeder” bodies of water be listed with the Category 1 designation as well. If the feeder rivers/streams are permitted to degrade in terms of quality, it is inevitable that the receiving reservoirs will experience degradation. (786)

COMMENT 15: The commenter supports the Department’s selection of the following 9 waterways, which provide drinking water to 3.5 million residents and protect key habitat of threatened and endangered species including our national symbol - the Bald Eagle - Boonton, Charlottesburg, Doughty, Glendola, Manasquan, Oradell, Round Valley, Swimming River and Wanaque Reservoirs. (3252)

COMMENT 16: The commenter supports the proposed amendments to the Surface Water Quality Standards (SWQS) that upgrade the antidegradation designations from Category Two (C2) to Category 1(C1) for the Glendola Reservoir, the Manasquan Reservoir and the Swimming River Reservoir. (786)

COMMENT 17: The commenter recognizes the importance of providing a high level of protection for potable water supplies. The three Monmouth County reservoirs proposed for Category 1 designation, the Manasquan, the Glendola, and the Swimming River, are all vital potable water resources. In concept, the commenter supports Category 1 designation for these water supply systems but serious concerns force the commenter to reserve its full support until more is known about their potential related applications. (798)

COMMENT 18: The commenters applaud the Governor McGreevey's proposing Swimming River Reservoir as Category 1. The entire town of Holmdel consumes drinking water from the Swimming River Reservoir, along with a good number of people from Monmouth County. (1198,1766,2695,3421)

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COMMENT 19: The commenters supports application of Category 1 status to the Timber Swamp Brook as long as doing so will not reduce the safe yield of the Manasquan Reservoir system. Immediately downstream of the Manasquan Reservoir dam, nearly all flow in the Timber Swamp Brook is from the reservoir. Given that reservoir quality changes over time due to pumping impacts discussed elsewhere, the brook's water quality will likewise change. (816,2443,3425)

COMMENT 20: The commenters support the proposed revision to the SWQS, whereby the Oradell reservoir will receive heightened water quality protection by designation as Category 1 waters. The reservoir is a vital component of United Water New Jersey's system that serves as the primary water supply source for over three-quarters of a million people in Bergen and Hudson counties. Its designation for increased protection is therefore, critical from a public health perspective, and will also serve to enhance the ecological and environmental value of this vital resource. (1081,1082,3084,3446)

RESPONSE TO COMMENT 2 THROUGH 20: The Department acknowledges the commenters' support for the upgraded antidegradation designation for the six selected stream segments and nine reservoirs.

COMMENT 21: The Department needs to commit funding and staff to update the Landscape Project mapping annually. Since species status and distribution are fluid, this keystone data layer must be kept current. The Department needs to update land use/land cover mapping every three to five years. Habitat is dynamic over space and time necessitating that this data layer remains current. Conduct statewide surveys for endangered, threatened and species of concern every 3-5 years. Like habitat, species distributions change over time. Colonial waterbirds offer a poignant example. This group of animals, which breed in mixed colonies, contains endangered and threatened species. Historic colonies may attract an endangered species, which will necessitate a change in the landscape data. Timely entry of data into the Natural Heritage database is needed. A lengthy lag time of processing new data into this database fundamentally compromises the

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ability of the Department to protect rare, threatened and endangered species. (3252)

RESPONSE: The Department appreciates the commenters support for the Landscape Project. The Department plans to continue its efforts to improve the delay between data collection and data availability.

COMMENT 22: We applaud the Department's exhaustive use of biological data sets in its determination. However, we would ask that the Department formally adopt the Landscape Project in its current and future considerations. The Landscape Project is the Department's best tool for delineating threatened and endangered species habitat. We would ask that the Department continue to consult with its Endangered & Nongame Species Program on any and all future regulation proposals as it has done with this rule. NJ Audubon urges the Department to ensure that all regulations are consistent with the NJ Endangered & Nongame Species Conservation Act. (3252)

RESPONSE: The Department appreciates the support for its use of biological data sets. The comments concerning the use adoption of the Landscape Project are beyond the scope of this rulemaking.

COMMENT 23: The Department has been able to propose Category 1 status for these stream due to the availability of long-term water quality and biological monitoring information. The descriptive and assessment information provided in the proposal is proof of the value provided by long-term monitoring. The commenters encourage the Department to take all possible actions to continue and expand its water resource monitoring, as a fundamental component of all watershed management and restoration. (3425,2443,816,3693)

RESPONSE: The Department appreciates the commenters support for its continuing efforts to monitor and assess the condition of New Jersey's rivers, lakes, estuaries and ocean.

COAH

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COMMENT 24: The rule proposal is inconsistent with principles of environmental equity. The waterways proposed for reclassification are largely located outside of urban areas in which lower income and minority members live. Category 1 precludes discharges causing measurable, calculable or predictable changes. Discharges degrading waterways in areas with greater diversity would not be precluded. These changes provide no relief to areas where the less affluent are likely to reside, but would encourage further wastewater facilities in older developed areas where lower income and minority members are concentrated. There can be no doubt that that, if adopted, this rule proposal will make it more difficult to provide affordable housing alternatives and options in areas where the reclassified waterways are located, including areas designated by the State Plan as Suburban Planning Areas suitable for development. Indeed, the commenters' projects are projects that would, as a practical matter, be precluded from development if this proposed rule is adopted and applied. Yet, projects such as these are necessary if we are to give those of low and moderate income an opportunity to move to the areas where "wealthier members of society have moved". The effect of this rule would be to deny the poor and minorities the opportunity to live anywhere in the State they may choose, an opportunity that the more affluent and non-minority members of society take for granted. (3015a, 3015b)

COMMENT 25: Comments were made during the public hearing in Trenton that the Category 1 rules should not be adopted because they will interfere with the New Jersey constitutional mandate to provide affordable housing. However, the Supreme Court commented in Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158, 331, fn. 68 (1983) and specifically emphasizing its strong concern for protection of the environment and sound planning in a statement that they "intend nothing in this opinion to result in environmentally harmful consequences." Moreover, the New Jersey Supreme Court has also upheld the importance of antidegradation requirements in IMO the Issuance of a Permit by the DEP to Ciba-Geigy Corp., 120 N.J. 164, 177 (1990). As discussed therein, the antidegradation analysis does not preclude development, it does however require an analysis of discharge options to protect existing and designated uses of waterbodies. (318)

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COMMENT 26: The rule will have adverse social and economic impacts on efforts to provide affordable housing. (3015a, 3015b)

COMMENT 27: On March 7, 2001, COAH determined that Clinton Township's housing obligation for the period 1987-99 was 392 units and, on the petition of Clinton Township, granted substantive certification to a housing element and fair share plan for the period extending from 2001 to 2007. The substantive certification again designated the Windy Acres site (referred to in the Township's housing element and fair share plan as the AH-I site) as a site for the production of low and moderate income housing, namely, through inclusionary residential development with 145 units set aside for low and moderate income households, plus a contribution by the developer of \$240,000 to subsidize construction or rehabilitation of 37 additional low and moderate income housing units. (878,1406,2406)

COMMENT 28: The effect of the proposed reclassification of the South Branch of the Rockaway River will be to thwart provision of affordable housing in Clinton Township, which would disproportionately be occupied by low and moderate income African-American and Latino individual and families. It would thus perpetuate the existing pattern of racial segregation in New Jersey, as manifested in Clinton Township. It would violate the Department's duties under the New Jersey Constitution, the Law Against Discrimination, and the Federal Fair Housing Act. (878,1406,2406)

COMMENT 29: The proposed reclassification of the South Branch Rockaway Creek would thwart implementation of Clinton Township's COAH-approved plan for meeting its constitutional fair-share housing obligation. By imposing an almost unattainable standard for discharges into the stream, it would create a grave peril of wholly thwarting construction of the proposed East Clinton Sewer Treatment Plant, thereby preventing development of the Windy Acres development, which for 10 years has been the keystone of Clinton COAH-approved plan. (878,1406,2406,3537)

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RESPONSE TO COMMENTS 24 THROUGH 29: The additional protections provided by the Category 1 designation do not preclude development, including residential development with an affordable housing component. The Department continues to support the efforts of COAH and communities striving to meet their affordable housing obligation. However, affordable housing and environmental protection are not mutually exclusive as suggested by some commenters. In fact, as noted by one of the commenters, the New Jersey Supreme Court recognized in Southern Burlington County NAACP v. Township of Mount Laurel, 92 N.J. 158 (1983) (“Mt. Laurel II”) that affordable housing and environmental protection are not incompatible concepts. The Court also recognized that environmental constraints are an appropriate factor for trial courts to consider in analyzing the “builder’s remedy.”

The Department has identified waterbodies that meet the definition of Category 1 and provided a basis for each waterbody. For each of these waterbodies, the Department has determined that additional water quality protections are necessary and appropriate to maintain and preserve the existing surface water quality characteristics that led them to be upgraded. The additional protection provided by the Category 1 designation is that a discharge may not cause a change in the surface water quality. The Department disagrees with the suggestion that the Category 1 designation precludes development. Category 1 does not preclude a surface water discharge, although discharges to Category 1 waterbodies may not degrade water quality.

Because the standard is that existing water quality must be maintained, an analysis must be done on a discharge-specific basis to determine the effluent limits. The Category 1 designation attaches to the waterbody, not the type of project. The Category 1 standard applies equally to all surface water discharges regardless of the source of the wastewater from industrial, commercial, retail or residential development, including residential development with an affordable housing component. In addition, development utilizing septic systems or permitted discharges to ground water, connection to regional wastewater treatment facilities can be evaluated as alternatives to surface water discharges.

COMMENT 30: The Department has not adequately informed the public of the affect of this

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regulatory proposal. The Department has merely stated that the protection of surface waters of the State will result in a positive social impact. That conclusion depends upon whether the projects disallowed or amount of money spent in order to comply with the rule, translate into a measurable benefit to the environment. (309)

COMMENT 31: The Department has stated that the economic costs will vary and has listed several treatment options and associated costs. The public is not adequately advised of the economic impact. Information concerning the costs to be incurred and benefits to be achieved is required for informed decision making. (309)

RESPONSE TO COMMENTS 30 THROUGH 31: The Department indicated that new and expanded dischargers would be required to meet the Category 1 standard. The factors that influence the economic impacts such as the size of the receiving stream, the volume of wastewater, current levels of pollutants in the receiving stream, and effluent characteristics, precludes a “one size fits all” analysis. The economic impact will be influenced by the treatment technologies selected by the applicant to achieve the effluent limitations for the new or expanded discharge. These choices are the responsibility of the applicant. Through the permitting process, the Department establishes effluent limitations based upon the volume of wastewater and the discharge location provided in the application. In large part, the economic impacts are based upon the choices made by the applicant. The benefit of this action will be the protection of high quality waters that qualify as “exceptional ecological significance” or “exceptional water supply significance.”

COMMENT 32: The proposed amendments clearly do not take into account all of the impacts that will occur with their adoption. The constitutional property rights of landowners, who have spent millions of dollars and thousands of hours trying to develop land in accordance with applicable laws must be considered. It is patently unfair and unjust to change the rules at this late stage of the game. (3537)

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RESPONSE: The Category 1 designation does not preclude a wastewater discharge to surface water. As indicated in Response to Comments 122-126 and 160-165 site specific conditions may result in very stringent effluent limitations designed to achieve surface water quality standards, including the Category 1 standard of “no measurable change.” To the extent that the commenter is recommending that a “grandfathering” provision should be provided, see Response to Comments 127-128 and 158-159. The Department does not have the ability to control the manner in which a particular project obtains approvals beyond those issued by the Department. The Department is charged with the conservation of the State’s natural resources. Where the Department has determined that a waterbody qualifies as Category 1 and therefore warrants special protections, it is appropriate for the Department to take action to protect these resources.

COMMENT 33: The social and economic impact analysis in the rule proposal is inadequate and fails to satisfy the Administrative Procedural Act (“APA”) as DEP has failed to acknowledge readily anticipated social and economic impacts that will result if the reclassifications are adopted. It is predictable that reclassifying a waterway from Category Two to Category 1 would have the social and economic impact of prohibiting discharges into these waters even where DEP finds “after full satisfaction of the intergovernmental coordination and public participation provisions of the Department’s continuing planning process as set forth in the Statewide Water Quality Management Plan . . . that lowering water quality is necessary to accommodate important economic or social development in the area in which the waters are located.” The New Jersey Supreme Court has repeatedly reaffirmed the constitutional mandate for affordable housing. This proposal will directly effect projects that are inclusionary Mount Laurel developments. The proposal is not technically practical and the “no measurable change” standard renders inclusionary projects economically infeasible. The court has found that State agencies are obligated to facilitate affordable housing. Quarry Hills Development Corp. v. NJDOT, 267 N.J. Super. 1 (App. Div. 1993). (3015a,3015b)

COMMENT 34: The Department’s proposed reclassifications totally disregard the economic and social impacts such an action will cause in various communities of the State. (2434)

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RESPONSE TO COMMENTS 33 THROUGH 34: The Department believes that the Economic Impact Statement adequately addressed the potential impacts resulting from the proposed rule. The costs to comply with the Category 1 standard will depend on very site-specific conditions including existing water quality, stream classification including antidegradation designation, the volume of wastewater generated, projected effluent quality, and stream flow. These factors are utilized to determine effluent limitations. The applicant is responsible for proposing treatment technology that will achieve the required effluent limitations. For potential dischargers, the economic costs are expected to vary with the effluent limitations based upon the relative size of the discharge in relation to the size of the receiving waterbody. The larger the waterbody relative to the proposed discharge, the smaller the economic impact will be based on the compliance requirements, the size of the discharge and the anticipated concentrations of pollutants in the wastewater. The Department has determined that the identified waterbodies are resources of “exceptional ecological significance” or “exceptional water supply significance” and therefore qualify for Category 1 protection. The Department’s longstanding policy has been to prevent a lowering of water quality in Category 1 waters, which provides an important social benefit.

Smart Growth

COMMENT 35: The proposed reclassifications to Category 1 will take away the State’s flexibility to allow for growth in growth centers where it is demonstrated that the environment will be fully protected. The current classifications allow for stream discharges associated with development when it is demonstrated that the environment will be fully protected. The reclassifications will have the practical effect of making large swaths of the State unbuildable even though certain areas within these swaths either are, or should be, growth centers under Smart Growth principles, and it is demonstrated that the environment will be fully protected.
(681,3424)

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COMMENT 36: The proposed upgrade to Category 1 is inconsistent with the Smart Growth criteria and the State Plan, which both Governor McGreevey and Commissioner Campbell are so vociferously espousing. The amendment will have negative impact on the environment. (3537)

COMMENT 37: If adopted, the proposed reclassification would have adverse social and economic impacts that are contrary to the public interest. Among other things, the reclassifications would deny the Department flexibility to allow important development needed to meet society's needs, including but not limited to hospitals, schools, and affordable housing. The existing rules require that the ecology including threatened and endangered species habitat and potable water supplies, be protected regardless of whether it retains its Category Two classification or is reclassified as Category One. The distinction between these classifications lies in the regulatory authority the Department maintains to address important social and economic needs that may affect waters with quality that exceeds (i.e., is cleaner than) necessary to support the designated or existing uses. (3015a,3015b)

COMMENT 38: The existing SWQS provide that Category 2 waters with water quality characteristics better than or equal to the standard shall be maintained to protect existing and designated uses and where the water quality is worse than criteria it shall be improved. These provisions serve to provide the protection necessary for all waters included in this proposal. The change to Category 1 will provide the same protections but will severely reduce housing availability and affordability. The proposal will limit much-needed housing without any added water quality benefit. (2520)

COMMENT 39: New Jersey is in an economic crisis and this proposal will limit much-needed economic development without providing any additional water quality benefits. (3692)

COMMENT 40: The Smart Growth Impact Statement indicates that the upgrading of the use classification and antidegradation designations will likely impact decisions concerning land use and infrastructure development because wastewater discharges will have to meet the antidegradation policies. The Department should define the scope of the application and what

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provisions will be applied to achieve antidegradation. Potentially affected municipalities and parties should be able to determine whether they will be affected by the proposed regulations. (1414,3348)

COMMENT 41: The proposed reclassification of South Branch Rockaway Creek conflicts with New Jersey State Development and Redevelopment Plan (SDRP) and thereby violates Executive Orders Nos. 114 (1994), 4 (2002) and 38 (2002). (878,1406,2406)

COMMENT 42: The proposed reclassification of the South Branch of Rockaway Creek, flies in the face the SDRP. By imposing an almost unattainable standard for discharges into the stream, it would create a grave peril of wholly thwarting construction of the proposed East Clinton Sewer Treatment Plant, thereby preventing development of the Windy Acres development. The Department's adoption of proposed upgrade in the antidegradation designation is inconsistent with its own participation in the cross-acceptance process leading to the designation of this site as PA2 and within a planned regional center. It would demonstrate that the agency is not incorporating the SDRP into its decisionmaking process. (878,1406,2406)

COMMENT 43: The Windy Acres development is a 911-unit housing development located on 300 acres, which has received General Development Plan approval in 1996, amended 1999, pursuant to N.J.S.A.40:55D-45. It has also been approved by COAH as an inclusionary development that provides for 182 units of low and moderate income housing in an area with little or no other affordable housing which implements mandates of the State Planning Act to address problems of increased concentration of poor and minority in older urban areas and provide an adequate response to judicial mandates for low and moderate income housing. It is located adjacent to major highways (1-78 and U.S. Rte 22) and two active commuter railroad stations. The site is located in a Suburban Planning Area (PA2). In designating this area for smart growth, the State Plan determined that this is not an "environmentally sensitive" or a "rural" planning area. Moreover, this site is located in the Clinton Area Proposed Regional Center designated in Appendix C of the SDRP and on the State Plan Policy Map. It is thus located in an area into which the SDRP specifically seeks to channel development. (878,1406,2406)

COMMENT 44: The Milligan Farm site, and the Sidney Brook itself, are located in a Suburban Planning Area (PA2), an area specifically designated by the State Plan to “[p]rovide for much of the State’s future development.” In designating this area for smart growth, the State Plan determined that this is not an “environmentally sensitive” or a “rural” planning area. Milligan Farm is adjacent to a major State prison and an interstate highway, and in close proximity to existing major retail and commercial development. Moreover, consistent with its PA2 designation, Milligan Farm is an inclusionary, Mt. Laurel development, with 29 homes set aside for low and moderate income families in satisfaction of a portion of Union Township’s affordable housing obligation as approved by the New Jersey Council on Affordable Housing (“COAH”). The project has gained various approvals including some from the Department. Reclassification of the Sidney Brook is inconsistent with the State Development and Redevelopment Plan (“State Plan”) and is contrary to efforts to promote “smart growth”. Social and economic impacts include impacts on efforts to provide affordable housing throughout New Jersey. The Department failed to acknowledge these impacts depriving the public of a meaningful opportunity to understand the effect of the rule and provide comments. It is inconsistent with Executive Order No. 4 (2002) and Executive Order No. 38 (2002). This inconsistency with the State Plan is arbitrary and unreasonable. (3015a)

COMMENT 45: The proposed upgrade in the antidegradation designation for South Branch Rockaway Creek is a test case for whether the Department is incorporating the SDRP into its regulatory decision-making in accordance with the mandates of E.O. 114 (1994) and E.O. 4 (2002). Is the DEP actually prepared to utilize its regulatory process to foster development in locations designated for development by the SDRP? Or will it comply only selectively with SDRP, only where doing so is consistent with the parochial local sentiment or the views of special interest groups? (878,1406,2406)

COMMENT 46: The State Plan projects a need to house an almost one million additional people in New Jersey by the year 2020. Some of this growth will come from the immigrant communities that contribute so much to the diversity that makes New Jersey great. Yet, the State

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Plan recognizes that the urban areas can accommodate only about 200,000 additional residents.

Where will we build homes for the other 800,000 people? (878,1406,2406)

COMMENT 47: The Smart Growth Impact section states that it is to “protect the environment by planning for growth in compact forms, at locations and densities of use that make efficient use of existing and planned infrastructure and by increasing infrastructure capacities and growth potential in areas where development will not damage water resources, critical habitats or important forests. . .” All of the aspects of the Windy Acres Farm Development were designed, planned and will be implemented to meet that strategy. First, the Windy Acres Farm and the Creek are located in a Suburban Planning Area 2 as designated in the State Plan. The intent of the Suburban Planning Area 2 is to accommodate market forces and demand for new development and offers opportunities to expand infrastructure from neighboring Metropolitan Planning Areas. The Windy Acres Farm will do precisely that, by improving a portion of Route 22 and funding the construction of a state-of-the-art sewer treatment plant. It will also utilize existing infrastructure, including water, electric and gas lines and will serve a regional need by constructing a water tower to provide enhanced fire protection in the area. Second, it is located in close proximity to major sources of transportation, including Route 22, Route 78 and New Jersey Transit Bus and Rail Lines. Third, it conserves natural resources by clustering the homes on the Property. The Windy Acres Farm is approximately 300 acres, but the proposed site plan provides that approximately 50% of the Property will be Open Space when the Project is completed. It also provides the greatest buffers required by law around wetlands areas thus protecting critical habitat. The Property is a farm and so there are no important forests to be destroyed. Fourth, it is zoned for and will supply a variety of housing opportunities, most importantly meeting Clinton Township’s affordable housing obligation. In sum, the Windy Acres Farm Development is the epitome of Smart Growth and the adoption of the Amendments will fly in the face of all that Smart Growth stands for. (3537)

COMMENT 48: The Environmental Impacts that were considered by NJDEP in the New Jersey Register do not take into account many other factors that work against adopting the Amendment. First, the regional need for housing and the skyrocketing costs have forced many

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people who work in and around Clinton Township to live more than a 30 minute drive away from their place of employment. This causes air pollution as well pollution generated by stormwater runoff from the roads due to the excessive miles workers drive each day. It is a natural progression, the employers have chosen Hunterdon County to set up their businesses, now it is time to provide housing for their employees in close proximity to the businesses. Withdrawing the Amendments and allowing the much-needed housing to be built closer to places of business will have a positive effective on the environment. (3537)

COMMENT 49: Reclassification of South Branch Rockaway Creek is inconsistent with the State Development and Redevelopment Plan and is contrary to efforts to promote smart growth. The State Plan recognizes the need for growth and projects a need to house approximately one million additional people by 2020 with only 200,000 of these additional people projected in urban areas. The State Plan, approved through a cross-acceptance process in which the Department participated, indicates the Suburban Planning Area (PA2) will provide for much of the future development. The Windy Acres project provides affordable housing in PA2 where the State Plan indicates development is to be channeled and concentrated. It also would utilize state of the art wastewater treatment which has received Wastewater Management Plan approval from the Department. Adoption of this proposal would be contrary to Executive Orders 4(2002) and 38(2002). (3015b)

RESPONSE TO COMMENTS 35 THROUGH 49: Smart Growth is the term used to describe well-planned, well-managed growth that adds new homes and creates new jobs, while preserving open space, farmland, and environmental resources. Smart Growth supports livable neighborhoods with a variety of housing types, price ranges and multi-modal forms of transportation. Smart Growth is an approach to land-use planning that targets the State's resources and funding in ways that enhance the quality of life for residents in New Jersey. See Response to Comments 24-29 concerning affordable housing.

The Department's action is consistent with and supports the State Development and Redevelopment Plan (SDRP). The Category 1 designations implement State Planning Goal 2 by

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conserving the State's natural resources, namely, its surface waters and associated biota. The actions also implement State Planning Goal 4 by providing a clean, safe and attractive environment essential to assuring the health of our citizens. Sustainable supplies of clean water, clean air, and an abundance of open space and recreational opportunities also assure a sustainable economy. Policy No. 2 of the Statewide Water Resource Policies provides for the integration of State, regional and local land use and water management planning to avoid surface and groundwater degradation due to the cumulative effects of point and nonpoint sources of pollution. Consistent with the SDRP, the Department is designating waters that provide a sustainable supply of water, support unique flora/fauna and other selected water resources for additional protections.

The Department has identified waterbodies that qualify for Category 1 designation based upon exceptional ecological significance or exceptional water supply significance. Smart Growth principles recognize that development must take into account and accommodate these critical environmental resources.

The same surface water quality criteria apply in Category 1 and Category 2 streams. The additional protection provided by the Category 1 designation is to prevent degradation of existing water quality. While Category 2 does provide water quality protection, the Department has made a determination that that healthy waterbodies that represent a natural or undisturbed state deserve the highest level of protection to ensure that the ecological integrity of the waterbody is maintained through the designation as Category 1. The State's water supplies also deserve this level of protection to ensure that potable water supplies, and therefore drinking water, are as pollutant-free as possible. The Department believes that the upgraded antidegradation designations are consistent with Smart Growth and will ensure that development can occur without compromising critical environmental resources.

The Category 1 designation does not preclude a wastewater discharge to surface water. As indicated in Response to Comments 122-126 and 160-165, site specific conditions may result in very stringent effluent limitations. The applicant must determine treatment technologies to meet

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these effluent limitations if a discharge to surface water is proposed. However, a surface water discharge is not the only means of wastewater disposal. The applicant will need to evaluate the technology and costs associated with a variety of wastewater disposal options such as community on-site wastewater treatment with a discharge to groundwater, connection to a regional wastewater treatment plant, wastewater reuse, and individual on-site septic systems.

The Department believes that this action will discourage development where it would impair or destroy natural resources and the environmental qualities vital to the health and well-being of the citizens of New Jersey consistent with Executive Order No. 114(1994), Executive Order No. 4(2002) and Executive Order No. 38(2002).

COMMENT 50: The impact analysis of Category 1 and the wildlife criteria are blended together. The impacts are not clearly presented for either of the changes. We recommend that two issues be separated so that the impact analysis can be clearly understood by those municipalities, authorities, agencies and individuals that will be affected. (1414)

RESPONSE: The analyses are required to address all the proposed amendments. The Department believes the various analyses addressed the impacts of both the wildlife criteria and the Category 1 and distinguished between the two.

The Category 1 process

COMMENT 51: The commenter believes that the process used to select the streams proposed for reclassification to Category 1 is inappropriate. Reclassifications should be based upon an integrated statewide assessment of our waterways, not a disconnected approach whereby streams can be “nominated” for upgrade simply because development activities are proposed along the stream corridor. The Department has stated that “integrated ecological assessments” were completed for each stream proposed for upgrade; however, those assessments appear to be lacking technical foundation. If the Department is interested in upgrading streams for enhanced protection of degradation, it should complete a thorough evaluation of all New Jersey’s streams to select the proper candidates. (634a)

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COMMENT 52: The Department stated in the proposal that it will propose additional waters for upgraded antidegradation and stream reclassifications in the near future. In fact additional designations have already been announced by a December 19, 2002 news release. Why has the Department chosen to identify additional water bodies separately? Wouldn't it be more efficient to combine the designation of all water bodies into a single announcement with a single comment period and series of Public Hearings? (1414,1284,3174)

COMMENT 53: The Department needs to provide convincing validation as to the development of the waters which are included as Category One. This proposal does not provide this justification. The most important element would be the development of an overall outline for how these water bodies were chosen and what criteria were used. Such an outline would make clear how these waters were assessed with regard to a change in classification and would provide for future protection of the State's waterbodies. Without such an explanation, the process becomes unfounded. (3692)

COMMENT 54: The Department has an obligation to provide justification for any rule change. This is particularly relevant in this instance as the Department is proposing a clear departure from past practice in a manner that will have significant socio-economic costs. Such changes should not be made without compelling reason or convincing science. (2520)

COMMENT 55: The Category 1 designations for Sidney Brook and the Passaic River Basin clearly show the arbitrary and capricious nature of the process applied by NJDEP to reclassify streams in the State. (2434)

COMMENT 56: The Department has not provided clarification on how the water bodies in the proposal were chosen, including the criteria or provided its overall plan for reclassifying waters statewide. Since the Department has not provided this information the proposal should be withdrawn. (2520)

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COMMENT 57: The proposed reclassification of various streams appears to be the result of a haphazard process with minimal regard for the scientific data and numerous studies previously conducted in the environments of interest. (2434)

COMMENT 58: The Department failed to meet its obligation to fully explain its new reclassification policy and tell the public how it intends to proceed with any further reclassifications. Few if any rivers, reservoirs or streams have been reclassified to a more protective status in recent years, yet within a matter of months the Department has embarked on an aggressive reclassification program that has been *ad hoc*, with little rhyme or reason. The reservoir reclassifications, in particular, focus on an area of the State that is a prime water supply resource, but it is also an area of the State that has long been a target of anti-growth groups. In addition, many of the reclassifications are not related to water quality or water supply, leaving the public to ask, “Why these? Why now?” The regulated community is tempted to conclude that this represents a “back door” approach to “smart growth,” but the basis of this new aggressive reclassification policy should not be left up to guesswork. The public is entitled to a full explanation of the State’s intentions and a role in the complete assessment of its impacts. (1284,3074)

COMMENT 59: The Department’s aggressive new reclassification policy would create a regulatory system where any stream in the State could be declared Category One. Previously, only those streams of genuine exceptional quality with few if any discharges received a Category 1 classification. Now the State is reclassifying waterways so that rivers and streams that supply Category 1 reservoirs, in particular, some with several significant dischargers, are being affected by new Category 1 designations. This represents a dramatic change in the way water bodies are classified in New Jersey with impacts on the public that the Department has not fully considered. (1284,3074)

COMMENT 60: To evaluate this proposal, an understanding of the Department's overall plan for reclassifying waters statewide is needed. The proposal makes clear that additional reclassifications are in the works, but does not indicate what they are or why they were not

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included with this proposal. To provide comment, one needs to understand the overall rationale for reclassifying waters in the State; and how this process responds to policy directives such as those in Executive Order 2002-04. The Department must make clear how water bodies are chosen including the specific criteria being used. (2520)

COMMENT 61: The Department must provide clear and compelling justification to expand the waters included as Category 1. The current definition indicates that this category is intended to be very limited. The rule proposal does not provide such justification. The most important piece is an overall plan, which would make transparent how these waters were chosen. Without an explanation, the process is akin to a guessing game and precludes any predictability for future planning. (2520)

COMMENT 62: The proposal has been put together without input from the regulated community. As such, there are numerous fundamental questions that need be addressed in order for meaningful comments to be prepared. The open questions are many. Why were these specific water bodies chosen at this time? What were the parameters evaluated to select these water bodies? When will additional water bodies be proposed for reclassification? (2520)

RESPONSE TO COMMENTS 51 THROUGH 62: Pursuant to its statutory mandate, the Department is responsible for taking action to protect the waters of the State. With New Jersey's increasing population and recent drought conditions, it has become increasingly apparent that additional actions are necessary to safeguard the State's precious and limited water resources. The Category 1 stream designations in this rulemaking were not based on a nomination process, but rather were proposed and are being adopted through formal rulemaking procedures. The Department has embarked on an initiative to comprehensively review available data and information for the waters of the State to determine what waters qualify for additional water quality protection as Category 1. Not all waters may qualify under the definition of Category 1 at N.J.A.C. 7:9B-1.4. However, the Department believes that many waterbodies exhibit the characteristics necessary to meet this definition. The Department began the review process in early 2002 and quickly identified several waterbodies that meet the definition of Category 1.

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Those waterbodies were announced by Governor McGreevey on Earth Day 2002. Governor McGreevey additionally directed the Commissioner to identify additional waterbodies. Two of the first six streams proposed for Category 1 designation based upon “exceptional ecological significance” were initiated by rulemaking petitions in accordance with the Administrative Procedure Act and the Department’s rules.

The Department’s Category 1 initiative is ongoing. On January 6, 2003, the Department proposed Category 1 upgrades for six streams based on trout production information and one stream based on exceptional ecological significance (35 N.J.R. 158(a)). As part of this initiative, the Department published a Notice of Opportunity for Public Comment on both the Blueprint for Intelligent Growth (BIG) Map and potential candidate waterbodies for Category 1 Antidegradation classification (see 35 NJR 1308(b) March 3, 2003). The notice, published on the Department’s website at www.nj.gov/dep/antisprawl, requested public input in an attempt to assure all points of view are taken into account prior to formal proposal of any additional waterbodies for Category 1 antidegradation protection. The Department extended the time initially provided for comment to further involve the public in this process. The Department has received hundreds of nominations. The Department intends to review all waterbodies statewide beginning with the waterbodies nominated by the various programs within the Department and the public. This review will require time and resources to complete. However, the Department does not believe that it is necessary to delay proposing Category 1 upgrades where the assessment is complete and the determination has been made that the waterbody qualifies for Category 1 protections, while the assessment is pending for other waterbodies. At this time, the Department envisions an ongoing series of proposals as groups of waterbodies complete the assessment process. It has been and continues to be the Department’s intention to identify all appropriate waters for Category 1 protection and to assure that the State’s water resources are protected. The Department does not believe that the concepts of water resource protection and smart growth are mutually exclusive; instead they go hand in hand.

COMMENT 63: The Department has proposed to reclassify nine reservoirs based on “exceptional water supply significance”. This would be the first time the Department expanded

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the categories to this new group. Why were these particular reservoirs chosen out of all the reservoirs in the State? The proposal notes that these reservoirs are all part of systems serving more than 100,000 people and have intakes or drainage areas adjacent to the reservoir. Are these the only reservoirs meeting this criteria? Will other reservoirs meeting different criteria be added in the future? How was this threshold chosen and will it be changed to add additional reservoirs?
(2520)

RESPONSE: The Department identified nine reservoirs for upgraded antidegradation designation. These reservoirs were among the largest not already designated as Category 1. These reservoirs provide drinking water for over 4 million New Jersey residents. The Department is evaluating additional waterbodies, including other reservoirs for Category 1 protections. On March 3, 2003, the Department published a Notice of Opportunity for Public Comment seeking nominations from the public for additional waterbodies that should be evaluated for Category 1 protections. (35 N.J.R. 1308(b)) Candidate waterbodies are posted on the Department's website at www.nj.gov/dep/antisprawl. As indicated in Response to Comments 72-73, the Department believes that the additional protection provided by Category 1 satisfies the statutory objectives of the Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq., and the Water Quality Planning Act, N.J.S.A. 58:11A-1 et seq., and supports the Department's efforts to protect human health by ensuring potable water supplies, and therefore drinking water, are as pollutant-free as possible.

COMMENT 64: The Department has an obligation to provide justification for any rule change. This is pertinent in this instance as the Department is proposing an obvious departure from past practice in a way that will cause considerable socio-economic costs. Such changes should not be made without providing undeniable reason or credible science. The proposed changes should not be made until such time that the Department can provide compelling reason or convincing science to support the changes. The Department must withdraw the proposal until founded arguments can be made and effectively reviewed by both the public and scientific community.
(3692)

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RESPONSE: The Department has identified waterbodies that meet the definition of Category 1 and provided a basis for each waterbody. The Department evaluated the condition of the streams using an integrated ecological assessment. The condition of the aquatic community was assessed using macroinvertebrates, fish and T&E species. The Department also evaluated the instream habitat and the riparian habitat. For each of these waterbodies, the Department has determined that additional water quality protections are necessary and appropriate to maintain and preserve the existing surface water quality characteristics that led them to be upgraded. The additional protection provided by the Category 1 designation is that a new or expanded discharge may not cause a change in the surface water quality. As indicated in Response to Comments 51-63, the Department is embarking on a comprehensive evaluation of all waterbodies.

COMMENT 65: The Department has used the available data in the most unscientific way with no regard to the acceptable rules in developing a scientifically defensible basis for a very important decision with far reaching consequences. (2434)

RESPONSE: The Department reviewed all readily available environmental data and determined that the six stream segments qualified for Category 1 designation based on their “exceptional ecological significance.” The Department evaluated the various data sets available for each stream segment to determine whether the data supported the classification. The Department provided a summary of the factors considered for each stream segment and provided a link to the data which is available to the public through the internet. See Response to Comments 106-116 and 138-150.

COMMENT 66: The Department has announced other actions such as the Big Map and stormwater rule revisions that are also targeted at improving water quality and reducing impacts to water supply reservoirs and sensitive areas but has not defined how these amendments will be used in concert with these other actions. (3693)

COMMENT 67: The reclassifications alone do not provide a realistic picture of the impact of the proposal. The Department has already made public its intent to change the Stormwater Rules

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to require buffers on Category 1 streams. To properly evaluate the proposal to reclassify these 15 water bodies the Department has an obligation to make public all plans for additional regulatory restrictions. Without this information one cannot provide adequate comment on the proposal. (2520)

COMMENT 68: As the number of water bodies designated as Category 1 expands, there is a need to keep in mind the potential secondary impacts of the designation if other regulations use the Category 1 designation as a basis for extending control over land use and activities. The application of these regulations and the potential for misapplication concerns the commenters. (798, 3109)

COMMENT 69: The commenter would ask that any future rule proposals, including stream encroachment, ground water, and septic, include better protection of Category 1 waterways and wildlife habitat. (3252)

COMMENT 70: Implement Category 1 designations so that they reflect and are reflected in other regulatory areas. (3693)

COMMENT 71: The commenter requests the Department to protect Category 1 waterways in all of its current regulations. On this matter, the commenter applauds the administration's recent stormwater rule announcement to include 300' buffers on Category 1 waterways in undisturbed areas. (3252)

RESPONSE TO COMMENTS 66 THROUGH 71: The Department has identified waterbodies that qualify for Category 1 protections in this action. Other regulatory proposals that incorporate Category 1 to identify waterbodies for the purposes of implementing that program will have to identify and address any measures sought to be implemented for Category 1 waterbodies. For example, the Stormwater Management Rules proposed on January 6, 2003 at 35 N.J.R. 119(a), included a 300 foot special water resource protection area for Category 1 waterbodies and tributaries upstream within the same HUC 14. That proposal addressed how

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Category 1 will be used in that rule.

COMMENT 72: The proposal does not provide any discussion of how the Category 1 designation will provide increased protections for the waters proposed. (2520)

COMMENT 73: The proposal does not provide any discussion of how a Category 1 classification will provide increased protection for the waters proposed. The existing Surface Water Quality Standards at N.J.A.C. 7:9B-1.5(d) provide that Category Two waters with water quality characteristics better than or equal to the standard shall be maintained to protect the existing and designated uses and where the water quality is worse than the criteria it shall be improved. The change in classification will not provide any additional protection but will have a negative economic impact. (3692)

RESPONSE TO COMMENTS 72 THROUGH 73: The summary identified that Category 1 waters are protected from any measurable changes (including calculable or predicted changes) to the existing water quality. This is the protection established at N.J.A.C. 7:9B-1.5(d)6iii. Preventing degradation of water quality is a clear environmental benefit. The Water Pollution Control Act (WPCA), N.J.S.A 58:10A-1 et seq., authorizes the Commissioner to adopt rules to “prevent, control or abate water pollution.” N.J.S.A. 58:10A-4.

The Department agrees that Category 2 provides a level of water quality protection, although it also allows for water quality to be degraded in certain circumstances. The Department has determined that waterbodies that meet the definition of Category 1 at N.J.A.C. 7-9B-1.4 warrant additional protection, namely prevention of water quality degradation.

The Department believes this initiative furthers the policy of the WPCA which is to “restore, enhance and maintain the chemical, physical and biological integrity of its waters, to protect public health, to safeguard fish and aquatic life, and scenic and ecological values, and to enhance the domestic, municipal, recreational, industrial and other uses of water.” N.J.S.A 58:10A-2. The Water Quality Planning Act (WQPA), N.J.S.A. 58:11A-1 et seq., also provides a similar

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policy statement at N.J.S.A. 58:11A-2. The Department believes the Category 1 initiative fulfills these statutory objectives. This action also supports the Department's efforts to protect human health by ensuring potable water supplies, and therefore drinking water, are as pollutant-free as possible.

COMMENT 74: The commenter believes that the upgrading of Category 2 waters to Category 1 for drinking water or ecological purposes may be justified as long as the water bodies are contained within Federal and State park systems or other public lands. But regulating stream segments outside of public lands for no measurable change to water quality may cause undue hardship for landowners in and around the designated areas. (2728)

RESPONSE: Waterbodies that qualify for Category 1 protections are not limited to public lands. The Department has applied Category 1 designation to waterbodies that have been shown to support reproducing trout throughout the State. Category 1 designation does not prohibit private development or use of land for agricultural purposes. The implementation of Best Management Practices may be required in to order to address nonpoint source pollution.

Definition

COMMENT 75: A much clearer definition for a Category 1 waterbody is needed before further waterbodies are designated. (3448)

COMMENT 76: The definition of Category 1 Waters outlines five instances of what this category includes. The listed examples include only waters originating wholly within or flowing through government established parks and lands, trout production and maintenance waters, and shellfish waters of exceptional resource value. Obviously this definition implies that this category is intended to be very narrow. (3692)

COMMENT 77: While the Category 1 designation process is being broadened, the Department's current rules lack definitions of key terms within the Category 1 designation, and

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also do not have examples of exceptional ecological and water supply significance within that definition. (3693)

RESPONSE TO COMMENTS 75 THROUGH 77: The current definition of Category 1 waters at N.J.A.C. 7:9B-1.4 identifies specific types of waterbodies and factors the Department may consider in exercising discretion to designate waters as Category 1. The Department believes that this definition is technically sound, comprehensive in scope, and provides sufficient clarity. The Department disagrees with the comment that the definition is narrow. In fact the definition is quite broad in order to provide protections to waterbodies deemed “special” and therefore worthy of additional protections. Although not all waters of the State may qualify, the Department believes that many waterbodies present characteristics that should be protected from degradation. The Department began this initiative to identify and protect those waterbodies. The Department does not anticipate any changes to the current definition.

T&E

COMMENT 78: The use of the Category 1 antidegradation classification is an appropriate mechanism to provide protection for threatened and endangered species. Deleterious habitat modification can be violative of the Endangered Species Act (ESA). The United States Supreme Court has upheld federal regulations that define ESA’s prohibition on takings to include “significant habitat modification or degradation when it actually kills or injures wildlife.” Babbitt v. Sweet Home Chapter of Communities for a Great Oregon, 515 US 687, 697 (1995). Because of limited means to apply ESA consultation procedures to Clean Water Act (CWA) programs and concerns regarding state and individual permittee ESA liability, EPA, the US Fish and Wildlife Service (USFWS) and the National Marine Fisheries entered into a final Memorandum of Agreement (MOA) in 2001 to integrate species protection into state administered water quality programs to protect the needs of endangered and threatened species under the CWA. (318)

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COMMENT 79: The commenter supports the Department's use of Category 1 classifications for species protection because viable turtle, trout and mussel populations are indicative of superb habitat requiring Category 1 antidegradation protection. The primary goal of the Clean Water Act, and the Water Pollution Control Act, is to restore and maintain waters. Given the well documented presence of various Federally and State listed threatened and endangered species, the Department's proposed amendments to N.J.A.C. 7:9B-1.1 et seq. provide the necessary next step in the continuing process of achieving and maintaining a healthy freshwater environment. (318)

RESPONSE TO COMMENTS 78 THROUGH 79: The Department acknowledges the commenters support.

COMMENT 80: The Department states that a significant factor in selecting waters for upgraded antidegradation designation was their ability to support threatened and endangered species. Does this mean that an area could justify an upgrade in antidegradation designation, if the area is suitable habitat but not actual habitat? (2520)

COMMENT 81: The existing rules do not specify that endangered species should be provided a higher level of water quality than other aquatic organisms. Both the U.S. Fish & Wildlife Service and U.S. EPA agree that water quality criteria are presumed protective of endangered species, absent specific information indicating that a water quality standard will not be protective. The Department's statement that endangered species are part of the existing use that must be protected does not provide a sufficient rationale for concluding that the current water quality program is insufficient to protect that use. Thus there is no legal, scientific or factual basis for the Department to use the presence of endangered species as "a significant factor in the selection of the proposed stream segments . . ." (1284,3074)

COMMENT 82: The commenters agree that water quality should protect endangered species, as it is required to protect other species. But the mere presence of endangered species is not a

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basis for imposing more restrictive water quality requirements or for claiming that a water body is “of exceptional ecological significance.” (1284,3074)

COMMENT 83: The commenters believe these more restrictive use designations should be withdrawn until appropriately justified. The Department has failed to show that water quality is the primary reason that the various species are endangered. Absent information showing that water quality must be maintained at levels better than applicable water quality standards, it is not necessary to impose a Category 1 designation to protect these species. (1284,3074)

COMMENT 84: The commenters believe that the record does not support the Department’s apparent determination that the current classification of the water bodies referenced in this proposed rule will not protect endangered species. Indeed, the Department has never made such a finding, let alone subjected it to public scrutiny. (1284,3074)

RESPONSE TO COMMENTS 80 THROUGH 84: While a significant factor, the presence of Threatened and Endangered species (T&E) was not the only factor considered. The Department evaluated the condition of the waterbodies using an integrated ecological assessment. The Department assessed the condition of the aquatic community using macroinvertebrates, fish and T&E species. The Department also evaluated the instream habitat and the riparian habitat. For each of the streams where T&E species were evaluated as a factor, the stream exhibited excellent suitable habitat indicative of supporting a viable population and at least one verified, documented occurrence of the T&E species. While the streams upgraded in this action considered factors in addition to the presence of T&E species, the Department believes that there may be circumstances where the presence of a T&E species alone warrants Category 1 protection.

The same surface water quality criteria apply in Category 1 and Category 2 streams. The additional protection provided by the Category 1 designation is to prevent degradation of existing water quality. While Category 2 does provide water quality protection, the Category 1 designation prevents water quality degradation. Department has made a determination that these six waterbodies qualify for Category 1 based on an integrated ecological assessment.

COMMENT 85: The Department indicates that water quality has not played a significant role in loss of these species. For example, as stated by the Department, “although these species [wood and bog turtles] were once common species throughout this region of the State, intensive agricultural practices and poorly planned development have degraded many of the region’s drainages and associated wetlands and thus eliminated habitat for wood and bog turtles.” Similarly, loss of freshwater mussels is attributed to “destruction of habitat and degraded water quality due to dredging, channelization and erosion; introduction of exotic mollusks and dam construction. ...” Thus, it is apparent that destruction of habitat by gross activities has resulted in reductions in species prevalence, not slight changes in water quality that otherwise are deemed protective of even highly sensitive aquatic life. (1284,3074)

COMMENT 86: The wood turtle is fully protected based on the current stream classification. A review of the scientific literature identifies the type of habitat required by this species. The Department needs to identify specific scientific studies related to stream criteria justifying the proposed change. (1401a, 1401b)

RESPONSE TO COMMENTS 85 THROUGH 86: Other regulatory programs are designed to protect certain aspects of the T&E species habitat. In addition to habitat alteration, dwarf wedgemussels are especially sensitive to changes in water quality and are unable to avoid contaminants introduced in the water column. Therefore, existing water quality in dwarf wedgemussel areas needs to be maintained and protected. The upgraded antidegradation designation compliments the species and habitat protections provided by these programs by ensuring that water quality will not be degraded. As indicated in Responses to Comments 138-150, water quality impacts the viability of these species.

COMMENT 87: What role does the presence of “species of special concern” play in selecting waters for upgraded antidegradation designation? What weight did this factor play in the final decision to select waterbodies? (3692,2520)

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COMMENT 88: The proposal explains that a significant part in the selection of the proposed stream segments was “their ability to support threatened and endangered species.” The Department has failed to provide clarity with regard to the criteria and process used to make these determinations. (3692)

RESPONSE TO COMMENTS 87 THROUGH 88: The Department evaluated waterbodies for Category 1 upgrade using an integrated ecological assessment. The Department considered water quality, instream habitat, riparian habitat, the aquatic community using macroinvertebrates and fish, and Threatened and Endangered Species. The “Special Concern” designation applies to species that warrant special attention because of some evidence of decline, inherent vulnerability to environmental deterioration, or habitat modification that would result in their becoming threatened. This category would also be applied to species that meet the foregoing criteria and for which there is little understanding of their current population status in the State. The presence of Threatened and Endangered species was a factor in the six stream segments proposed for upgraded antidegradation designation. Occurrence information for species designated as Special Concern was considered supplemental to the presence of listed species when selecting stream segments to be upgraded. No recommendations for Category 1 upgrades were based specifically or solely on the presence of Special Concern species.

COMMENT 89: The Department’s claims that mussels “may suffer lethal or sub-lethal effects from pollutants discharged into waters” and “the free floating larval stage is especially vulnerable to environmental toxins” are pure speculation, unrelated to any specific information presented in the record or relative to the level of water quality that must be met in State waters. The Department may not abandon the current adopted regulatory regime and regulate based upon speculation, inference and innuendo. The need for a more restrictive regulatory approach must be based upon hard evidence and technical analysis confirming that the current regulatory program is not protective. (1284,3074)

COMMENT 90: With respect to the dwarf wedgemussel, the Department asserts that the species requires “silt-free, stable stream beds and well oxygenated, pollutant free water.” This

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statement does not mean that a Category 1 designation is needed. First, the primary needs of the dwarf wedgemussel are habitat-based regarding stream characteristics (non-silty, stable stream bottom). Second, meeting applicable standards will ensure “highly oxygenated water and pollution free conditions”. Thus, it is not apparent that any special protection is needed for this species. (1284,3074)

RESPONSE TO COMMENTS 89 THROUGH 90: In addition to dredging, channelization and erosion, exotic mollusks and dam construction, degraded water quality is also known to contribute to mussel declines. According to the U.S. Fish and Wildlife Service, industrial, agricultural, and domestic pollution is responsible for the dwarf wedgemussel’s disappearance over much of its historic range. 55 Fed. Reg. 9447 March 14, 1990. Due to the sensitivity of freshwater mussels to a wide variety of environmental pollutants, along with the mussel’s inability to avoid contaminants introduced in the water column, existing water quality in dwarf wedgemussel areas needs to be maintained and protected. Pequest River and Flat Brook were proposed for upgraded antidegradation based upon an integrated ecological assessment and not just the presence of dwarf wedgemussels alone.

COMMENT 91: The commenters believe this proposed rule amounts to the Department amending the bases for allowing Category 1 designations by adding a factor never adopted into the water quality rules, namely “the presence of endangered species.” The Department may not undertake such regulatory amendment without first undergoing notice and comment rulemaking. That action has not occurred and must precede any use of the “endangered species” factor as a basis for Category 1 designation. (1284,3074)

RESPONSE: The Department used an integrated ecological assessment which considered the presence of threatened and endangered species, the quality of instream habitat, the quality of the riparian habitat, the water chemistry, and the overall status of the aquatic community based on fish assemblage and macroinvertebrates. There can be no question that these factors are representative of the ecological resources of the State. Therefore, the consideration of threatened and endangered species as part of the overall determination that a waterbody qualifies as a

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waterbody of “exceptional ecological significance” is appropriate. The Department’s determination that these waterbodies warrant Category 1 antidegradation protection underwent notice and comment through this rulemaking.

Beaver Brook

COMMENT 92: Beaver Brook is listed as part of the Delaware River Basin. It should be listed as part of the Raritan River Basin. (3692,1261)

COMMENT 93: The Beaver Brook is an important high quality stream and we agree that it is of "exceptional ecological significance". Just downstream is the Lower Delaware Wild and Scenic River, which requires anti-degradation protection under Congressional designation. (486,3432)

RESPONSE TO COMMENTS 92 THROUGH 93: In the Summary of rule proposal, the Department inadvertently listed Beaver Brook under the Delaware River Basin. However, the Beaver Brook is listed correctly in the rule text under Table 4 for waters of the Raritan River and Raritan Bay Basin.

COMMENT 94: Much of the land along the Beaver Brook in the vicinity of the proposed C 1 upgrade is classified as Class B, Critical Areas and Class C, Critical Areas. Class B, Critical Areas contain lands exhibiting shallow depth to ground water, shallow depth to bedrock, slopes exceeding 15%, moderately erosive soils, and the Department documented moderate priority critical habitat (these lands have an intermediate pollution vulnerability). Class C, Critical Areas contain lands exhibiting slightly erodible soils, shallow depth to bedrock, and shallow depth to ground water (pollution vulnerability is considered moderate in these areas). The Department’s Endangered and Nongame Species Program also classifies this portion of the stream as moderate priority wood turtle habitat. For these reasons, the commenter urges the Department to designate Beaver Brook as Category 1. (1261)

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COMMENT 95: The commenters support the reclassification of Beaver Brook. (1261,3124)

COMMENT 96: It is irrational that the Annadale segment of the Beaver Brook be reclassified from Category Two to Category One. This segment of the Beaver Brook is located adjacent to two (2) major roadways, I-78 and Route 22, in a developed area subject to a significant amount of roadway runoff. Reclassification of the segment of the Beaver Brook would be in contradiction to the definition of a Category One. (3692)

RESPONSE TO COMMENTS 94 THROUGH 96: The Department evaluated the available information on Beaver Brook and determined that Beaver Brook qualified for Category 1 designation based on “exceptional ecological significance” based on an evaluation of the instream habitat, benthic macroinvertebrate community, and potential wood turtle habitat. The Department also evaluated the fish population and determined that Beaver Brook supported trout production, which also qualifies Beaver Brook for Category 1 protection under the definition.

Pequest trib

COMMENT 97: An inconsistency exists in the narrative describing the assessment conducted on each waterbody proposed for upgrade proposes to “amend the antidegradation designation of the portions of Pequest River from the Lehigh and Hudson River railway bridge to its confluence with the tributary at Janes Chapel that are currently designated as C2 to C1”, is not consistent with Table 2 – Waters of the Delaware River Basin. The reference to Janes Chapel is omitted and not mentioned in Table 2 or anywhere else. (3692)

RESPONSE: The effect of the Department’s proposal was to make all waterbody segments within the Pequest Wildlife Management Area Category 1. This segment, including where the tributary at Janes Chapel enters the river, was within a portion of the Pequest River that was already designated as Category 1.

South Branch Rockaway Creek

COMMENT 98: Readington Township Environmental Commission partnered with Tewksbury

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Township Environmental Commission, the Upper Raritan Watershed Association and Merck & Co., Inc. to develop and implement the Rockaway Creek Water Quality Monitoring Project; a project for which Merck received a DEP Watershed Management Award in December, 2000. A wood turtle was observed in the South Branch Rockaway Creek in Readington Township during the course of water quality monitoring. The Division of Fish and Wildlife's Freshwater Fisheries Lab has documented native trout reproduce in this waterway. A Category 1 designation is critical to ensure the viability of these threatened and pollution sensitive species. (987)

COMMENT 99: The commenter supports the reclassification of South Branch Rockaway Creek to Category 1 antidegradation status proposed in order to preserve the quality and quantity of water that serves up to a million people in the area. The commenter requests that the quality of these streams should be preserved at all costs.

(474,561,987,1042,1126,1261,1291,1292,1729,1862, 2068,2856,3124,3406,3558,3634.)

COMMENT 100: Much of the land adjacent to the South Branch Rockaway Creek has been classified as Class A, Critical Area with a high pollution vulnerability. Class A, Critical Areas contain lands exhibiting hydric soils, wetlands, floodplains, shallow depth to bedrock, slopes exceeding 25%, ground water recharge areas, shallow depth to ground water, severely erosive soils, and high priority critical habitat. The *Landscape of the Raritan River Basin Technical Report* (NJ Water Supply Authority, 2002) shows a 14% increase in urban land between 1986 and 1995. This report also shows that between 15 and 20% of the South Branch Rockaway Creek subwatershed had impervious cover in 1995. Based on Maryland's Center for Watershed Protection studies, stream degradation is expected in areas where greater than 10% impervious cover exists, and extensive or permanent stream damage can be expected where impervious cover is above 25%. The South Branch Rockaway Creek subwatershed is rapidly approaching this point. The Routes 78 and 22 corridors lie within a major portion of the subwatershed. Although this area is already well developed, room for expansion still exists, leaving the potential for more impervious cover which may lead to further degradation of the subwatershed. Potential increased railroad usage and car traffic associated with the proposed construction of a transportation center along Route 22 near the South Branch Rockaway Creek headwaters in

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Clinton Township is expected. The subwatershed is already approaching the 25% impervious cover mark, above which permanent damage to streams and rivers can be expected. The potential effect of continued increases in ground water usage on the stream's baseflow and the continued loss of wetlands, riparian areas and ground water recharge areas in the subwatershed may all exacerbate the problem. A Category 1 designation would help ensure that development that occurs in this subwatershed is held to a standard that does not compromise this important drinking water source. (1261)

COMMENT 101: The South Branch Rockaway Creek subwatershed is in transition from a rural to a suburban subwatershed. In the 1970's the local population increased by approximately 40%. Population has continued to grow significantly due in large part to the completion of Interstate 78 and associated development. Accordingly, issues that have arisen include potable water quantity and quality, stream health as impacted by point and non-point pollution sources, loss or degradation of riparian areas and associated wetlands, stormwater management, and impervious cover. As in the entire North Branch Raritan River Watershed, there is concern about the health of the streams in the South Branch Rockaway Creek subwatershed. (1261)

COMMENT 102: The commenter supports the Department's proposal to upgrade the South Branch Rockaway Creek to Category 1 status. There are already large development projects proposed for Readington Township, which will negatively impact the water quality of the South Branch Rockaway Creek unless immediate action on the proposed upgrade is taken. There are too few quality streams left in the State to allow another to slip away. (3558)

COMMENT 103: The South Branch Rockaway Creek is a documented wood turtle habitat. A wood turtle was observed in the South Branch Rockaway Creek in Readington Township during the course of water quality monitoring. A Category 1 designation is critical to the proposed segment of the South Branch Rockaway Creek to ensure the viability of these threatened and pollution sensitive species. (1126)

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RESPONSE TO COMMENTS 98 THROUGH 103: The Department acknowledges the commenters support for the Category 1 designation for South Branch Rockaway Creek.

COMMENT 104: The Department claims there is a high frequency of wood turtle (State Threatened) sightings on the South Branch Rockaway Creek. However, the Department records indicate only three observations over a ten-year period (9/92, 6/25/99, and 6/29/01). Was a comprehensive study completed by Department to determine whether there is truly a large wood turtle population in this region? Was the statement that the South Branch Rockaway Creek may support one of the best wood turtle populations in the Piedmont physiographic province based only on observing three wood turtles in a ten-year period? The Department does not reference any other threatened or endangered species present. (634c)

COMMENT 105: In the discussion to support the reclassification of South Branch Rockaway Creek, the Department indicated that wood turtles have been documented in several locations along the riparian corridor, suggesting that the entire stretch is critical habitat. The Department must show the entire length is habitat. Also, how many is several? How far apart were the sightings? (2520)

RESPONSE TO COMMENTS 104 THROUGH 105: The Natural Heritage Database contains three records and 2 additional sightings are awaiting official entry. Four sightings in the last four years within an approximate 4-mile stretch of the South Branch Rockaway Creek, and the undisputed superb quality of the riparian and surrounding habitats suggests that a sizeable wood turtle population may be present. In addition, the South Branch Rockaway Creek ranks as very high priority for wood turtle conservation. For the purposes of determining “exceptional ecological significance”, the Department evaluated only the presence of aquatic and semi-aquatic species. However, the Department notes that in July 2000 threatened bobolink was documented in the open fields south of the South Branch Rockaway Creek and Bald Eagles have been observed in the vicinity of Cushetunk Lake.

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COMMENT 106: The most critical factors in determining whether a wood turtle will use a particular waterway are structural factors in a stream such as pool depth, water velocity, bottom substrate, and cover (e.g., rootwads and undercut banks). (Greene, 2001). Wood turtles have been found in New Jersey along moderately eutrophic FW2 non-trout streams with a moderately high turbidity (e.g., Papakating Creek below the Route 23 Bridge and Wallkill River below Franklin Pond). Some of the desired food and habitat components that are described above for wood turtles are actually more plentiful in more eutrophic water courses (e.g., mud bottoms, algae, worms, snails). Therefore, upgrading South Branch Rockaway Creek does not seem warranted to protect water quality for the wood turtle. (634c)

COMMENT 107: The justification presented by the Department for the proposed re-classification of South Branch of Rockaway Creek to Category 1 waters is largely based on the presence of State threatened wood turtle in proximity to the stream. The rule change indicates that the wood turtle will be protected as a result of the proposed change by ensuring no measurable water quality change in the stream (including calculable or predicted changes). The Department has failed to present any scientific evidence that a change in the water quality classification to Category 1 will have any measurable impact on the State threatened wood turtle. (1401a)

COMMENT 108: The wood turtle is fully protected based on the current stream classification. A review of the scientific literature identifies the type of habitat required by this species. The Department needs to identify specific scientific studies related to stream criteria justifying the proposed change. (1401a)

COMMENT 109: There are many Category Two streams in New Jersey presently supporting wood turtles that are both downstream of development and treatment plant discharges. The existing FW2-TM (C2) stream classification is already a very high-level designation. There has been no information presented as part of the “integrated ecological assessment” that indicates a more restrictive categorization is necessary to protect the wood turtle. We find it incomprehensible that the Department has presented such little technical support for

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reclassifying this segment. The Department has provided no basis to selectively target this stream segment, although we suspect that the true reason lies in the fact that many want the development that is proposed within its watershed stopped. Therefore, we request that the proposed revisions to the Surface Water Quality Standards upgrading the South Branch Rockaway Creek to Category 1 be withdrawn. (634c)

COMMENT 110: The commenter believes that the existing categorization of the South Branch Rockaway Creek provides sufficient protection of the wood turtle and re-categorizing the stream is both unwarranted and unnecessary. Proposed amendments to N.J.A.C. 7:9B-1.15(f) would upgrade the surface water classification of the South Branch Rockaway Creek to Category 1(C1) from its headwaters to Cushetunk Lake. This stream runs through proposed Windy Acres Development and is the stream to which the proposed Clinton East advanced wastewater treatment plant will discharge. The reclassification of this stream centers on protecting the State threatened wood turtle, which has been found in the South Branch Rockaway Creek. (634c,3015b)

COMMENT 111: Data and documentation before the Department established that the reclassification of South Branch Rockaway Creek is not needed to protect threatened and endangered species, potable water supplies or other environmental concerns. This data includes the USGS report “Water Quality in the Long Island – New Jersey Coastal Drainages, New York and New Jersey, 1996-98” (Circular 1201) which finds that stream conditions for fish have improved since the 1970’s with a statistically significant increase in IBI scores. Permit conditions and the treatment proposed assure the Windy Acres development will comport with factors recognized by USGS as contributing to stream improvements. (3015b)

COMMENT 112: The proposed rule reclassifying the South Branch Rockaway Creek should not be adopted. South Branch Rockaway Creek does not exhibit the characteristics that warrant Category 1 classification. Reclassifying streams such as the South Branch Rockaway Creek as Category 1 would largely wipe out the distinction between Category Two and Category 1 waterways. There is nothing to suggest that South Branch Rockaway Creek differs from any

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other FW2, Category 2 waterbodies that currently meet Surface Water Quality Standards, many of which provide habitat for threatened or endangered species. (3015b)

COMMENT 113: The “integrated” assessment completed by the Department was to include study of the fish species data collected by the Department at the stations in its Fish Index of Biotic Integrity (IBI) Network. The network of monitoring locations does not include a Fish IBI station on the South Branch Rockaway Creek. Therefore, this data could not have been used for the “integrated environmental assessment”. (634c,3692)

COMMENT 114: The Department has not been able to provide the referenced “integrated environmental assessment” for the South Branch Rockaway Creek. If such an assessment exists, it has not been made available for public review and comment. It appears that this rule has no scientific basis. (3692,3015b)

COMMENT 115: The practical implications of the rule change relate specifically to restricting new housing development in the watershed. In the case of Windy Acres project proposed in Clinton Township, this project is dependent on a wastewater treatment plant (Clinton East Wastewater Treatment Facility) for effluent disposal to the South Branch of Rockaway Creek. The project is in Planning Area 2 according to the State Plan. If "smart growth" is part of the overall development plan for the state of New Jersey, re-classification of streams such as South Branch Rockaway Creek, must be carefully evaluated to ensure that science is behind the decision. (1401a)

COMMENT 116: The Department claims that it has completed an “integrated ecological assessment” and found that the South Branch Rockaway Creek possesses exceptional ecological significance. The Department references several available data sets to support its conclusions. There is absolutely no recent water quality data available for the South Branch Rockaway Creek from the headwaters to Cushetunk Lake. Omni Environmental Corporation completed a watershed study as part of the Clinton East NJPDES permit application. Readington Environmental Commission also has an ongoing monitoring program in the South Branch

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Rockaway Creek. The Department has indicated that data on the benthic macroinvertebrate community in the South Branch Rockaway Creek establishes that this waterway is nonimpaired and exhibits optimal habitat quality. There are two AMNET stations on the South Branch Rockaway Creek. The downstream station shows moderately impaired and sub-optimal scores. The Department should focus on the cause of the downstream impairment if it truly is concerned about environmental protection and restoration, rather than upgrading the classification of the upstream segment that has remained unimpaired as development has occurred in the region. (634c)

RESPONSE TO COMMENTS 106 THROUGH 116: The Department selected South Branch Rockaway Creek for Category 1 based on the optimal in-stream habitat, the overall condition of the aquatic community as measured by macroinvertebrates, and the presence of wood turtles. Fisheries data was not available from the Index of Biotic Integrity (IBI) Network; however, as indicated in Response to Comment 117-118, the Department has sampled and confirmed the presence of reproducing trout.

The Department has current and historical biological monitoring data demonstrating that the section of the South Branch Rockaway Creek proposed for upgrade to Category 1 has been consistently Non-Impaired with Optimal riparian habitat. The Department first applied the benthic macroinvertebrate biological indicator at the South Branch Rockaway Creek monitoring station AN0367 (located on Windy Acres Farm, Lebanon Township.) in May 1994. At that time the stream was rated as Non-Impaired based upon the very healthy benthic macroinvertebrate population present. The staff conducting the assessment noted that the surrounding land use was “Wooded / farm” with the habitat exhibiting optimal characteristics. Five years later the biological monitoring at this station continued to demonstrate solidly Non-Impaired characteristics, along with optimal riparian habitat. Once again, the Department’s investigators noted that the surrounding land use was agriculture with a wooded stream corridor. However, this is not the situation at the next station downstream on the South Branch Rockaway Creek, ANO368 (located at Rt. 22 in Whitehouse). In May 1994, and again in May 1999, benthic macroinvertebrate monitoring assessed this station as being Moderately Impaired, with a

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Suboptimal riparian habitat. During these monitoring events the investigating staff noted the surrounding land use as being mostly urban / suburban with some commercial development. Since station AN0368 is outside and downstream of the stream segment proposed for upgrade, the moderate impairment was not considered to be relevant to demonstrating the applicability of Category 1 protection to the upstream waters. Because the Department is aware of the impairments demonstrated at the downstream station, the Department did not include that portion in the Category 1 designation for South Branch Rockaway Creek.

Wood turtles can occur in eutrophic streams with moderate turbidity. However, occurrence does not necessarily indicate viability of a population; it merely denotes that the species is present. The Department has comprehensive wood turtle population data on three streams, two of which are already Category 1: Van Campens Brook (C1 stream - Warren County), Papakating Creek (Sussex County - from Lynn Smith Rd to Rt 565; Sussex County), and Flat Brook (C1 stream - Sussex County). As these three populations are highly robust (250-500 individuals per population) and exhibit signs of healthy population recruitment, the Department considers them to be viable populations. Compared to these three streams, South Branch Rockaway Creek possesses very similar attributes in riparian structure, water depth, clarity, turbidity, substrate composition, and surrounding habitat. Thus, occurrence is only one factor considered in determining whether a waterbody qualifies as “exceptional ecological significance”.

The Department has reviewed the 1994 study done for the Clinton East permit and has determined that the study demonstrated that existing water quality in the South Branch Rockaway Creek is better than the surface water quality criteria. This study further supports the Department’s finding of “exceptional ecological significance.”

COMMENT 117: Young-of-year brown trout have been confirmed in South Branch Rockaway Creek. Stream surveys conducted by the Department’s Division of Fish and Wildlife between August and September 2002, at four different points along the South Branch Rockaway revealed forty-four young-of-year brown trout. As discussed in the Department’s summary for this proposal - "Documentation of reproducing trout populations is routinely used by the Department

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as the basis for stream classification upgrades. In addition, trout production streams receive Category 1 antidegradation protection." Accordingly, the South Branch Rockaway Creek should be reclassified as Category 1 as proposed and must also be identified as a trout production (TP) waterbody. Since this information was available to the Department before the rule was proposed, the South Branch Rockaway Creek should be listed as a TP waterbody when the rules are adopted. Since the TP status where young-of-the-year trout are present is routine and automatic, this should be characterized as a non-substantive change on adoption. (318,1126,1261)

COMMENT 118: Trout are not mentioned in the supporting narrative assessment, and this water body is already classified as trout maintenance. No evidence is shown to reclassify the South Branch Rockaway Creek as trout production. Although the Department recently reinstated the trout-stocking program (effective April 2002) in the South Branch Rockaway Creek, the high stream temperatures that occur in this stream during warm weather conditions in the summer do not make this stream conducive to supporting trout on a long-term basis. (634c)

RESPONSE TO COMMENTS 117 THROUGH 118: The Bureau of Freshwater Fisheries sampled the South Branch Rockaway Creek in August and September of 2002 and found young of the year trout. Although the survey was conducted in the fall of 2002, the final assessment was not available at the time of proposal. A classification change upon adoption from trout maintenance (TM) to trout production (TP) is considered as a substantive change because the public was not given an opportunity to comment on the trout status of the South Branch Rockaway Creek. Therefore, the Department will propose the upgrade in trout status in a future rulemaking. However, confirmation of trout production supports the Department's determination that the South Branch Rockaway Creek qualifies as Category 1. Trout production will be protected as an existing use.

COMMENT 119: Although the Department is not proposing to reclassify the South Branch Rockaway Creek because of exceptional water supply significance, several comments were made at the public hearings on this matter. Although the water from the South Branch Rockaway

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Creek is technically a water supply, the closest downstream water intake location is on the Raritan River in the Bound Brook/Manville area. Therefore, water from the South Branch Rockaway Creek must flow to the Rockaway Creek into the Lamington River, which flows into the North Branch Raritan River that ultimately flows into the Raritan River. The annual mean stream flow in the South Branch Rockaway Creek flow is approximately 28 cubic feet per second (cfs), while the annual mean stream flow in the Raritan River at Manville is 775 cfs. Therefore, less than 4% of the flow at the closest water intake could be made up of South Branch Rockaway Creek water. Clearly, upgrading the South Branch Rockaway Creek to Category 1 will not result in a measurable improvement to water supply quality. (634c)

COMMENT 120: The South Branch Rockaway Creek discharges to the Raritan River, which provides drinking water to over 1,000,000 New Jersey residents. The South Branch Rockaway Creek is the major conduit for water released from Round Valley Reservoir and supplies flow to the Elizabethtown Water Company's drinking water intake in Bound Brook. The southern portion of the Rockaway Creek catchment is impacted by the Route 78 and Route 22 corridor which subjects this watershed to tremendous development pressure. A Category 1 designation would help ensure that development that occurs in this subwatershed is held to a standard that does not compromise this important drinking water supply. (987)

RESPONSE TO COMMENTS 119 THROUGH 120: The Department proposed to upgrade the antidegradation designation for South Branch Rockaway Creek based upon “exceptional ecological significance” not “exceptional water supply significance”. However, the Department’s policy is to protect all freshwaters as potential sources of public water supply and this action supports this policy.

COMMENT 121: Busby Block, Kullman Industries and, a few miles to the east, the Readington Lebanon Sewer Authority (RLSA) discharges to the waters of the South Branch Rockaway Creek. The proposed Clinton East Sewer Plant is designed utilizing advanced wastewater treatment technology incorporating biological nutrient removal and ultrafiltration membrane technology. This technology produces a consistently high water quality effluent and

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is reliably in use throughout New Jersey today, but sadly not at the RLSA Plant. Thus, the Clinton East Plant will have a much more positive effect on the environment than the existing plant to the east. (3537)

RESPONSE: All dischargers must comply with surface water quality standards. Effluent limitations necessary to achieve the surface water quality standards include consideration of the wastewater flow generated, the available dilution, existing water quality, projected effluent quality, criteria based upon stream classification, and the antidegradation designation. To meet the applicable surface water quality standards, advanced wastewater treatment may be necessary. The Department notes that the facilities identified by the commenter are existing facilities discharging to the South Branch Rockaway Creek downstream of the Category 1 segment.

COMMENT 122: As part of the analysis conducted for the Clinton East Wastewater Treatment Facility NJPDES permit application, an Anti-Degradation and Socioeconomic Study was submitted. This study identified the parameters that would have no measurable impact on the stream based on the water quality to be produced from the proposed treatment plant. Parameters such as carbonaceous biochemical oxygen demand (CBOD), total suspended solids and total phosphorus will be discharged at levels resulting in no measurable impact to the stream. Other constituents were identified which would meet Category 2 classification but would have a measurable impact. These constituents include total dissolved solids, nitrate-nitrogen, ammonia-nitrogen and copper, lead and zinc. All of these constituents will be discharged at very low levels and will have no adverse impact on the wood turtle. The results of the socioeconomic study showed that it is not economically feasible to remove all constituents to levels associated with no measurable impact. In fact, the type of technology required to remove all constituents to background levels is largely unproven. Technologies, such as reverse osmosis and ion exchange, are largely untested on the scale proposed and have no reliable track record in applications involving domestic sanitary sewage. Difficulties with reject constituents, chemical and biological fouling, and reliability of components all lead to the conclusions that this technology is still largely unproven. (1401a)

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COMMENT 123: Reclassification of the South Branch of Rockaway Creek to Category 1 will prevent the discharge of any wastewater effluent to the stream. Technology does not currently exist, which is reliable and proven, to meet no measurable impact criteria concerning all constituents currently regulated by the Department. (1401a)

COMMENT 124: In the Department response to comments received on the South Branch Rockaway Creek reclassification petition, the Department states, “The discharge of treated wastewater into Category 1 waterbodies is not prohibited.” The commenter would appreciate guidance demonstrating the manner in which a wastewater treatment plant constructed to discharge to a Category 1 stream without changing existing water quality. (634c)

COMMENT 125: The Department has indicated that the reclassification of South Branch Rockaway Creek to Category 1 does not prevent the discharge of treated effluent. However, the Department fails to address the technological significance of this proposed rule change. An analysis of the economic impacts to the affected parties should be conducted. Technologies available to meet the limits should be presented along with supporting data. The Department has failed to present such data. Based on the total lack of data and information to justify the change, it appears that the Department is fully aware of the implications of the proposed rule change and the likelihood that no wastewater effluent discharges will be allowed in South Branch Rockaway Creek. (1401a)

COMMENT 126: The Windy Acres project will be serviced by a state-of-the art wastewater treatment plant employing the latest technology that will fully protect the quality of the water in the South Branch Rockaway River. The site and the sewer plant are included in the Department approved Warren Township wastewater management plan and have been incorporated into the regional Water Quality Management Plan. The Department has previously granted a DAC for the plant. The plant will conform to the specification recently negotiated with Department staff as part of the NJPDES approval process. As part of this process, voluminous data and documentation has been developed showing that this technologically advanced wastewater treatment process will fully protect the "fishable, swimmable" quality of the water in the South

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Branch of the Rockaway River, thus protecting the environment while providing needed housing in an area planned for residential housing development. (878,1406,2406)

RESPONSE TO COMMENTS 122 THROUGH 126: All discharges must comply with surface water quality standards. The Department establishes effluent limitations necessary to achieve the surface water quality standards based upon the volume of wastewater flow generated, the available dilution, existing water quality, projected effluent quality, surface water quality criteria based upon stream classification, and the antidegradation designation. In order to protect the State's water quality, very stringent permit limitations may be imposed. In the case of Category 1, the effluent limitations established by the Department implement the "no measurable change" standard. The applicant is responsible for proposing treatment technology that will achieve the required effluent limitations. Due to the site-specific factors listed above, there may be circumstances where a discharge to surface water may be financially or technologically impractical. The applicant may need to consider other alternative wastewater disposal options such as individual septic systems, on-site community groundwater disposal system, and connection to a regional wastewater treatment plant.

COMMENT 127: The Department should withdraw the proposal to upgrade the antidegradation designation for South Branch Rockaway Creek or at the very least grandfather the Windy Acres Farm Development because of the extensive approvals and pending applications that are outstanding, the location of the development in an area designated for growth by the State Plan and affordable housing considerations. The proposed reclassification may not be applied because Windy Acres has secured approvals and acquired vested rights long before the proposed new rules. The Department is estopped from applying the new rules or reclassifications to Windy Acres. (3015b, 3537)

COMMENT 128: The Department should not delay action on the issuance of the NJPDES permit for Windy Acres on the South Branch Rockaway Creek to await the outcome of this proposal. The proposed rule is apparently intended to assure protection of T&E by prohibiting all discharges that would result in a measurable or calculable change in water quality. In the case of

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South Branch Rockaway Creek, case specific studies demonstrate that the discharge will have no adverse impact on T&E or their habitat nor will the discharge pose any threat to water supply. (3015b)

RESPONSE TO COMMENTS 127 THROUGH 128: The Department provided justification for the upgrade in the antidegradation designation for the South Branch Rockaway Creek and therefore has not withdrawn the upgrade. See Response to Comments 106-116. The Surface Water Quality Standards do not include a “grandfathering” provision and the Department did not propose to add one as part of this rule action. Therefore, the Category 1 designation takes effect upon publication. The Department does not believe that it is appropriate to delay action to protect the State’s waters of “exceptional ecological significance.”

The Department notes that Clinton Township submitted an application in February 2003 for the NJPDES permit to service the Windy Acres project, after the Department proposed the upgrade for South Branch Rockaway Creek. Also, the Windy Acres project has not yet obtained site plan approvals as noted in Comment 134.

COMMENT 129: The commenters urge the Department to immediately implement the Category 1 protections for the streams. The proposed upgrades and protections will be meaningless if the Department should act to permit any new discharges into these streams prior to enactment of the new rules. The Department should not finalize or issue any discharge permits for the affected streams prior to the new Category 1 classifications becoming law. This is the only way to insure the quality of these streams for ourselves and future residents of New Jersey.

(33,51,52,60,69,75,79,108,121,122,129,135,154,170,181,202,207,213,223,237,253,263,265,272, 273,276,290,303,304,305,329,363,372,390,399,413,430,455,479,491,493,494,530,539,541,544,5 45,547,552,583,584,596,613,614,615,616,617,618,619,637,660,667,668,684,687,702,721,722,73 6,737,762,763,769,778,781,784,794,812,823,871,879,896,903,944,961,962,972,1042,1049, 1062,1068,1078,1079,1085,1102,1103,1113,1114,1125,1128,1129,1130,1145,1175,1189,1190, 1205,1219,1227,1228,1241,1248,1266,1291,1295,1303,1312,1324,1335,1337,1364,1366,1397,

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COMMENT 130: The commenter is opposed to the Department issuing any approvals for a sewage treatment facility that would discharge into the South Branch Rockaway Creek. (1126)

COMMENT 131: In light of the Department's earlier delay in granting the South Branch Rockaway Creek and Sidney Brook petitions for rulemaking, prompt adoption of the SWQS amendments is imperative to protect and maintain the waterbodies' ecological significance. The pending draft NJPDES permit proceedings for the Milligan Farm plant and anticipated draft NJPDES permit for Windy Acres highlight the need to expedite the SWQS amendments. In order to avoid separate, administratively inefficient proceedings at a later date - which would be necessary in order to have the NJPDES permits comport with new antidegradation classifications – it is crucial that the Department act immediately with regard to this rulemaking. The rule should be adopted no later than Earth Day 2003. (318)

COMMENT 132: The arbitrary and capricious delay in rulemaking necessitates immediate adoption of the Category 1 reclassifications to protect and maintain the waterbodies' ecological significance. On October 21, 2002 the Department formally granted the petitions for rulemaking

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upgrading Sidney Brook and South Branch Rockaway Creek to Category 1 classifications where no measurable changes are allowed by N.J.A.C. 7:9B-1.5(d)6iii. The New Jersey Administrative Procedure Act explicitly provides a timeline for an agency's response to an interested person's petition to adopt a new rule, or amend or repeal an existing one. The Department has not complied with all timing requirements for action on petitions for rulemaking. Because the permits for Milligan Farms and Windy Acres are proceeding concurrently with the petition for rulemaking, the delay rulemaking must be completed prior to conclusion of the permitting process to avoid an inefficient and illogical result. (318)

COMMENT 133: We urge the Department to accomplish these amendments before any pending permits are granted for projects that would impact these streams. This is especially true for sewage effluent discharges and nonpoint source pollution from stormwater runoff. In order to protect the water quality of these streams, anti-degradation measures must be applied to these high quality waterways. To allow projects that would negatively impact or increase the wasteload to be absorbed by these streams to move ahead, would be dooming these streams to lower in-stream water quality. It would also expose them to a host of other impacts, hydrologic and geomorphologic, that will degrade them, just when they are on the brink of being recognized as needing special protection. (486,3432)

RESPONSE TO COMMENTS 129 THROUGH 133: Permits are issued in accordance with the regulations in effect at the time of issuance. Further, comments regarding the issuance of permits are beyond the scope of this rulemaking. However, the Category 1 designation takes effect upon publication, and permits issued after today's publication will have to meet the Category 1 standards.

COMMENT 134: It has been estimated that the construction of each home in the State generates approximately 100 jobs. The present Site Plan application, which was denied by the Clinton Township Planning Board, but was appealed and found to be arbitrary and capricious by Retired Judge D'Annunzio, the Special Master, proposes the construction of 911 homes on the

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Windy Acres Farm. It is simple to do the math and see that tens of thousands of jobs will be lost at the Windy Acres Farm alone if the Amendments are adopted. (3537)

RESPONSE: The contention that tens of thousands jobs will be lost due to a single project is difficult to believe. The commenter incorrectly presumes that Category 1 precludes all development. The Category 1 designation does not preclude a wastewater discharge to surface water, and a surface water discharge is not the only means of wastewater disposal. An applicant proposing a surface water discharge to a Category 1 waterbody will need to evaluate the technology and costs associated with a variety of wastewater disposal options such as community on-site wastewater treatment with a discharge to groundwater, connection to a regional wastewater treatment plant, wastewater reuse, and individual on-site septic systems.

Sidney Brook

COMMENT 135: The commenter supports the reclassification of Sidney Brook to Category 1 antidegradation status proposed in order to preserve the quality and quantity of water that serves up to a million people in the area. The commenter requests that the quality of these streams should be preserved at all costs. (456,474,830,1287,1364,1719,1729,1758,1862,2227, 2568,2659,2660,2855,2856,2882,3006,3092,3124,3406,3634.)

COMMENT 136: By memo dated August 2, 2001, the Department indicated that Sidney Brook contains “superb habitat” and also indicated the importance of water quality to both the wood and bog turtles. United States Fish and Wildlife Service (USFWS) has repeatedly echoed this view. This information supports reclassification of Sidney Brook to Category 1. (318)

COMMENT 137: The US Fish and Wildlife Service (USFWS) recently provided limited §7 consultation to the Department. In its technical comments on the permit proceedings for the proposed Milligan Farm wastewater discharges into Sidney Brook, the USFWS clearly expressed its stance regarding the current SWQS rulemaking. In the USFWS’s January 31, 2003 correspondence concerning the Milligan Farms NJPDES permit, the USFWS stated that it strongly supports the Category 1 classification for Sidney Brook. This reasoning applies equally

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to the other waterbodies since they provide similarly critical habitat for threatened and endangered species. (318)

RESPONSE TO COMMENTS 135 THROUGH 137: The Department acknowledges the commenters support.

COMMENT 138: The Department has not performed or relied on any existing scientific studies that identify any correlation between wood turtle or bog turtle habitat and water quality nor has the Department performed any scientific study to examine the effects, if any, of existing discharges to documented habitat for these species. Existing Category 2 Water Quality standards are adequate to protect bog and wood turtle in Sidney Brook. (1245)

COMMENT 139: There is no scientific basis that reclassification of Sidney Brook to Category 1 is required to protect the wood turtle and bog turtle and their habitat. (1245)

COMMENT 140: There really is no “integrated environmental assessment” for the Sidney Brook. The Department has failed to produce such an assessment. (3015a)

COMMENT 141: The Department should not reclassify Sidney Brook to Category 1 unless and until scientific studies have been completed to justify the change. There is currently insufficient knowledge to support the change. (1401b)

COMMENT 142: The Department should not upgrade the antidegradation designation for Sidney Brook without undertaking a full ecological assessment and giving the public an opportunity to review and comment due to the significant development restrictions that accompany the proposed upgrade. It should be noted that the current classifications of the subject streams already ensure that these waterways will remain fishable, swimmable and drinkable, and that endangered species will be protected. (681,3424)

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COMMENT 143: The proposed reclassification of Sidney Brook to Category 1 is largely based on the presence of threatened and endangered turtle populations in proximity to the stream. The rule change indicates that the wood and bog turtles will be protected as a result of the proposed change by ensuring no measurable water quality change in the stream. The Department has failed to present any scientific evidence that a change in the water quality classification to Category 1 will have any measurable impact on the intended uses of the Sidney Brook or any scientific information related to wood turtles and bog turtles that would justify the change. (1401b)

COMMENT 144: The proposed rule reclassifying the Sidney Brook should not be adopted. Sidney Brook does not exhibit the characteristics that warrant Category 1 classification. Reclassifying streams such as the Sidney Brook as Category 1 would largely wipe out the distinction between Category Two and Category 1 waterways. New Jersey's current Surface Water Quality Standards Rules, including the Category Two classification of the Sidney Brook, provide abundant protection to water quality and stream ecology. Category 1 designation is not needed to protect water supplies, threatened or endangered species or other ecological concerns. (3015a)

COMMENT 145: The water quality study of the Sidney Brook completed in 1997 for the Milligan Farms permit shows exceedences of Surface Water Quality Standards (SWQS) even under natural conditions. The Department did not deem it necessary to reclassify Sidney Brook as Category 1 at that time since water quality resulting from the proposed discharge would continue to remain protective of the Brook's intended uses. (2434)

COMMENT 146: The Department reclassified Sidney Brook FW2-NT in 1997. Before that reclassification, Sidney Brook was classified as FW2-TM. It is quite apparent that the State's sole justification for reclassifying Sidney Brook as a Category 1 stream was based on a single habitat macroinvertebrate survey conducted along the lower reaches of the Brook and the Wood Turtle sightings in the watershed. Paradoxically, the healthy macroinvertebrate communities in the stream appear to thrive under the stream's current Category 2 classification. There is,

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therefore, no scientific basis to reclassify the stream to maintain the observed healthy communities. There is no credible scientific basis to relate non-discernable changes in water quality of a stream to changes in the functioning of habitats for threatened and endangered species. In fact, the Department's own scientist, states that discharge of advanced wastewater treatment effluent will have no impacts on such habitats. It is, therefore, clear that the Department had no basis to reclassify Sidney Brook based on anticipated changes in water quality or alleged impacts to habitats of endangered species. (2434)

COMMENT 147: A proposed point source discharge from the Milligan Farms Wastewater Treatment Plant resulted in the issuance of a NJPDES permit in 1999, and a draft revoke and reissue permit now awaiting final action by the Department. This permit (both as originally issued in 1999 and as proposed to be reissued) is fully protective of the threatened and endangered wood and bog turtle species and their habitat located downstream of the proposed discharge. (1401b,3015a)

COMMENT 148: The proposed reclassification of Sidney Brook to Category 1 is largely based on the presence of threatened and endangered turtle populations in proximity to the stream. The rule change indicates that the wood and bog turtles will be protected as a result of the proposed change by ensuring no measurable water quality change in the stream. The Department has failed to present any scientific evidence that a change in the water quality classification to Category 1 will have any measurable impact on the intended uses of the Sidney Brook or any scientific information related to wood turtles and bog turtles that would justify the change. (1401b)

COMMENT 149: The cited literature on the water quality of Sidney Brook does not contain any new data or direct assessment of surface water quality. A water quality study and modeling analysis were completed on Sidney Brook. This information was submitted to the Department as part of the permit application for Milligan Farms' proposed wastewater treatment facility. The study concluded that the anticipated impacts would be non-discernable and limited to a reach of

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the stream less than a mile long. Based upon the Department's review of this study, a NJPDES permit was issued for Milligan Farms. (2434)

COMMENT 150: Milligan Farms is dependent on a wastewater treatment plant for effluent disposal. The project is in Planning Area 2 according to the State Plan and contains Mount Laurel housing. It has received all local and State Approvals pending a decision from DEP on whether to revoke and reissue the previously issued discharge permit. If smart growth is part of the overall development plan for the state of New Jersey, reclassification of streams such as Sidney Brook must be carefully evaluated to ensure that science is behind the decision. DEP has failed to provide the science to support its decision. (1401b)

RESPONSE TO COMMENTS 138 THROUGH 150: The Department applied an integrated ecological assessment and determined that Sidney Brook qualified as a waterbody of "exceptional ecological significance". Therefore, the application of Category 1 designation to this waterbody is appropriate. The exceptional in-stream habitat, the overall condition of the aquatic community as measured by macroinvertebrates, the presence of fifteen different fish species including adult Brook Trout and the presence of bog and wood turtles were factors in this determination. Another indicator of the stream's exceptional ecological significance is the presence of stable banks with infrequent erosion, little sediment deposition, no channelization, and healthy riparian corridor including riffles, boulders, runs and pools. The same surface water quality criteria apply in Category 1 and Category 2 streams. The additional protection provided by the Category 1 designation is to prevent degradation of existing water quality. While Category 2 does provide water quality protection, the Category 1 designation prevents water quality degradation. The Department has determined that Sidney Brook exhibits these characteristics that qualify the waterbody for Category 1 designation. The Department has reviewed the 1997 water quality study cited by the commenter and has determined that existing water quality is better than the current surface water quality criteria. This data further supports the Department's finding of "exceptional ecological significance."

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Water quality may indirectly impact bog and wood turtles by altering habitat and food availability. Bog turtles favor low sedge communities. Degraded water, rich in nitrates, phosphates and chlorides, facilitate the establishment of invasive vegetation (e.g. Phragmites, cattail, purple loosestrife, red maple) which eventually supplants the low sedge communities ultimately causing a decline in reproductive success. It is also well established that wood turtles derive a substantial portion of their nutrition from aquatic organisms (e.g. gastropods, benthic invertebrates, mollusks, amphibians), which are well known to be adversely affected by water quality degradation. Furthermore, the largest and most viable wood turtle populations in the State occur primarily on non-impaired streams that are not subject to sewage effluent.

COMMENT 151: Thirty-six existing NJPDES permitted sewage treatment plants discharge to streams mapped as wood turtle habitat by the ENSP Landscape Project. The Landscape Project utilized recent sightings of wood turtle for their maps. Therefore, it is assumed that wood turtles continue to inhabit these streams, in spite of the discharges. Many of these plants have been in existence for an extended period of time. This suggests that these discharges do not adversely affect wood turtles or their habitat in the receiving streams. The presence of these 36 plants that discharge to documented wood turtle habitat raises the question of what is the basis of the reclassification and why the Sidney Brook would be singled out for reclassification as a Category 1 stream. (1245)

RESPONSE: As indicated in Response to Comments 138-150, the upgrade in antidegradation designation for Sidney Brook was based upon an integrated ecological assessment and not based solely on the presence of wood turtles. The Department is in the process of reviewing the antidegradation designation for all waterbodies statewide. Many of the treatment plants identified by the commenter discharge to Category 1 waterbodies and several other treatment plants discharge to waterbodies included in the Department's candidate list for Category 1 upgrades. The Department disagrees with the commenter's assertion that discharges do not adversely affect wood turtles and their habitat. The fact that wood turtles are present near a discharge does not address the long-term impact. The wood turtle population could be in decline but still present.

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The largest and most viable wood turtle populations in the State occur primarily on non-impaired streams that are not subject to sewage effluent.

COMMENT 152: Habitat for the wood turtle and bog turtle is protected under other regulatory programs. Observations associated with areas of older development, such as that typically found in the lower Passaic watershed, are not indicative of impacts to be anticipated from any future proposed development, such as in the Sidney Brook watershed. Unlike the older development typical in the lower Passaic watershed, future development in areas such as the Sidney Brook must be designed to include stringent measures for stormwater management, soil erosion and sediment control, stream corridor protection and endangered species habitat protection. These existing standards are imposed by the Department's LURP as part of the NJ Freshwater Wetlands Act Rules and the NJ Flood Hazard Area Control Act Rules; by the Hunterdon County Soil Conservation District as part of the Soil Erosion and Sediment Control regulations; by municipal zoning requirements; and by the Residential Site Improvement Standards. Accordingly, these observations associated with the lower Passaic basin would not provide justification for reclassifying the Sidney Brook. Furthermore, the USFWS protect endangered and threatened species and their habitats under the Federal Endangered Species Act. Specifically, in the case of any potential activity in wetlands in the vicinity of bog turtle habitat, a review by the USFWS is triggered by any application for a Freshwater Wetlands Permit. We are aware of numerous cases in which the Service and the applicant have agreed on design features that are fully protective of bog turtle habitat, even in cases where the habitat was onsite or nearby. (1245)

RESPONSE: Other regulatory programs are designed to protect certain aspects of the T&E species habitat. The upgraded antidegradation designation compliments the species and habitat protections provide by these programs by ensuring that water quality will not be degraded. The upgrade in the antidegradation designation for Sidney Brook is based upon the determination that the waterbody is of "exceptional ecological significance" using an integrated ecological assessment. In the Stormwater Management rule proposal, the Department has proposed amendments to the Flood Hazard Area Control and Freshwater Wetlands rules.

COMMENT 153: Expanding the list of Category 1 waters based upon a possibility is scientifically unacceptable. In the discussion to support the reclassification of Sidney Brook, the Department notes that in regard to wood turtles there are excellent signs that a viable population is present within the drainage. The Department must show the entire length is habitat. Also, how many is several? How sightings? (2520)

RESPONSE : The Natural Heritage Database contains two records and 4 additional sightings are awaiting official entry. This information is based upon limited surveys performed by the Endangered and Nongame Species Program. All of the sightings occurred within the Sidney Brook watershed. The furthest distance between sightings is 1.23 kilometers and the closest distance was about 40 meters. The survey identified turtles of various age classes which is an excellent sign that a viable population is present within this drainage. Wood turtles are dependent on Sidney Brook's clear water for foraging, breeding and hibernating. The complex of wetland and upland habitats surrounding the riparian corridor provides important nesting and foraging habitat for the wood turtles in the summer months. The Department upgraded Sidney Brook based upon an integrated ecological assessment. See Response to Comments 138-150.

COMMENT 154: The first water supply intake is approximately 27 miles downstream from the confluence of Sidney Brook with the South Branch-Raritan River. It is also important to note that more than 20 million gallons per day (mgd) of wastewater treatment effluent is discharged into the reaches of the river upstream of the Elizabethtown Water Company intake. The proposed treatment discharge of 0.12 mgd flow from Milligan Farms is a miniscule percentage of the total flow of the South-Branch Raritan at the intake of the Elizabethtown Water Company in Bound Brook. (2434)

RESPONSE: The Department proposed to upgrade the antidegradation designation for Sidney Brook based upon "exceptional ecological significance" not "exceptional water supply significance". However, the Department's policy is to protect all freshwaters as potential sources of public water supply and this action supports this policy.

COMMENT 155: The proposed discharge from Milligan Farms to Sidney Brook would allow substantial degradation of the water quality as well as threatened and endangered species habitat. The permit actions would allow a discharge into a section of Sidney Brook that is habitat for the State-threatened wood turtle and the Federally-threatened and State-endangered bog turtle. Based on the signed rule proposal by Commissioner Bradley Campbell, dated October 18th, in support of upgrading Sidney Brook to Category 1 status, it is clear that the Department recognizes the water quality and surrounding wildlife throughout Sidney Brook to be of utmost importance in terms of maintaining and protection this valued, yet limited resource. Issuing Hovnanian Co. the sewage permit, as proposed, would appear to be in direct violation and without question contradictory of Governor McGreevey's Smart Growth Policy. Governor McGreevey stated that "it is in the public interest...to discourage development where it may impair or destroy natural resources or environmental qualities that are vital to the health and well-being of the present and future citizens of this State." (830)

COMMENT 156: Do not grandfather any current stream discharge permits. (3124)

COMMENT 157: The commenter urges the Department to immediately implement the Category 1 protections for the streams. The proposed upgrades and protections will be meaningless if the Department should act to permit any new discharges into these streams prior to enactment of the new rules. The Department should not finalize or issue any discharge permits for the affected streams prior to the new Category 1 classifications becoming law. This is the only way to insure the quality of these streams for our selves and future residents of New Jersey.

(33,51,52,60,69,75,79,108,121,122,129,135,154,170,181,202,207,213,223,237,253,263,265,272, 273,276,290,303,304,305,329,363,372,390,399,413,430,455,479,491,493,494,530,539,541,544,5 45,547,552,583,584,596,613,614,615,616,617,618,619,637,660,667,668,684,687,702,721,722,73 6,737,762,763,769,778,781,784,794,812,823,871,879,896,903,944,961,962,972,1042,1049, 1062,1068,1078,1079,1085,1102,1103,1113,1114,1125,1128,1129,1130,1145,1175,1189,1190, 1205,1219,1227,1228,1241,1248,1266,1291,1295,1303,1312,1324,1335,1337,1364,1366,1397,

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RESPONSE TO COMMENTS 155 THROUGH 157: Permits are issued in accordance with the regulations in effect at the time of issuance. Further, comments regarding the issuance of permits are beyond the scope of this rulemaking. However, the Category 1 designation takes effect upon publication and permits issued after adoption will have to meet the Category 1 standards.

COMMENT 158: In the event the Department does decide to reclassify the Sidney Brook, the rule proposal should be modified to “grandfather” the Milligan Farm discharge. (3015a)

COMMENT 159: The Department should not delay action on the NJPDES permit for Milligan Farm to await the outcome of this proposal. (3015a)

RESPONSE TO COMMENTS 158 THROUGH 159: The Department provided justification for the upgrade in the antidegradation designation for the Sidney Brook. See Response to Comments 138-150. The Surface Water Quality Standards do not include a “grandfathering” provision and the Department did not propose to add one as part of this rule action. Therefore,

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the Category 1 designation takes effect upon publication, and permits issued after today's publication will have to meet the Category 1 standards of "no measurable change". The Department does not believe that it is appropriate to delay action to protect the State's waters of "exceptional ecological significance."

COMMENT 160: A reclassification of Sidney Brook to Category 1, as a practical matter, will prevent the discharge of any effluent to the stream. Technology does not currently exist which is reliable and proven to meet no measurable impact criteria concerning all constituents. (1401b,3015a)

COMMENT 161: The Department has indicated that the reclassification of Sidney Brook to Category 1 does not prevent the discharge of treated effluent. Theoretically, this may be true. However, the Department fails to address the technological significance of this proposed rule change. An analysis of the economic impacts to the affected parties should be conducted. Technologies available to meet the limits should be presented along with supporting data. The Department has failed to present such data. (1401b)

COMMENT 162: The original modeling exercise completed by Najarian Associates in 1996 for the Milligan Farms project clearly demonstrated that the minimal water quality changes resulting from the discharge of a proposed advanced wastewater treatment facility will dissipate within less than a mile from its point of discharge. (2434)

COMMENT 163: The Anti-Degradation and Socioeconomic Study for the Milligan Farms NJPDES permit application identified the parameters that would have no measurable impact on the stream based on the water quality to be produced from the proposed treatment plant. Parameters such as carbonaceous biochemical oxygen demand (CBOD), total suspended solids and total phosphorus will be discharged at levels resulting in no measurable change to existing water quality. Other constituents will meet C2 classification but will result in increases above background levels. These constituents include total dissolved solids, nitrate-nitrogen, ammonia-nitrogen, copper and zinc. All of these constituents will be discharged at very low levels and

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will have no adverse impact on the wood or bog turtle. These findings were presented in the September 2000 Anti-Degradation & Socioeconomic Analysis for the Milligan Farms Wastewater Treatment Plant. The results of the socioeconomic study showed that it was not economically feasible to remove all constituents to levels associated with no measurable impact. In fact, the type of technology required to remove all constituents to background levels is largely unproven. Technologies, such as reverse osmosis and ion exchange, are largely untested on the scale proposed and have no reliable track record in applications involving domestic sanitary sewage. Difficulties with reject constituents, chemical and biological fouling, and reliability of components all lead to the conclusions that this technology is still largely unproven. (1401b)

COMMENT 164: The Milligan Farms wastewater treatment plant is designed utilizing advanced wastewater treatment technology incorporating biological nutrient removal ("BNR") and ultrafiltration membrane technology. This treatment technology produces a consistently high water quality effluent with extremely low turbidity. The technology is in use in New Jersey and is reliable and proven. Data from the anti-degradation study prepared for the Milligan Farms project confirmed the high quality and clarity of the proposed effluent and determined that the C-2 water quality standards were protective of the habitat value of Sidney Brook for Wood and Bog Turtles. (1401b)

COMMENT 165: Even if the proposal were technically practical, which it is not, the "no measurable change" standard would render Milligan Farms economically infeasible. There are two components to the economics of a wastewater treatment plant: (1) capital costs and (2) ongoing operation and maintenance (O&M) costs. As documented in the antidegradation analysis, not only would the capital costs be far greater if a "no measurable change" criteria were applied, but, perhaps more significant, the annual O&M costs would be far greater as well. These excessive user costs would be economically impractical for any suburban project, particularly an inclusionary housing development. (3015a)

RESPONSE TO COMMENTS 160 THROUGH 165: All discharges must comply with surface water quality standards. The Department establishes effluent limitations necessary to

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achieve the surface water quality standards based upon the volume of wastewater flow generated, the available dilution, existing water quality, projected effluent quality, surface water quality criteria based upon stream classification, and the antidegradation designation. In order to protect the State's water quality, very stringent permit limitations may be imposed. In the case of Category 1, the effluent limitations established by the Department implement the "no measurable change" standard. The applicant is responsible for proposing treatment technology that will achieve the required effluent limitations. Due to the site-specific factors listed above, there may be circumstances where a discharge to surface water may be financially or technologically impractical. The applicant may need to consider other alternative wastewater disposal options such as individual septic systems, on-site community groundwater disposal system, and connection to a regional wastewater treatment plant.

Existing Water quality

COMMENT 166: Antidegradation policies (N.J.A.C. 7:9B-1.5(d)6iii) state that Category 1 waters "shall be protected from any measurable changes (including calculable or predicted changes) to the existing water quality." It is unclear as to how "existing water quality" is defined. Natural instream water quality varies over the course of a day, over the course of a season, and over the course of a year. Water quality is influenced by stormwater runoff, so the quality will typically change during and after storms. Water quality also varies along a stream segment because of changes in channel geometry, substrate, vegetative cover, etc. It is imperative that the Department define "existing water quality" in order for dischargers and potential dischargers, to understand how this rule proposal will affect them. What parameters will be used to define quality? What locations will be used? How many samples will be collected? Will samples be collected under varying flow conditions, weather conditions, and seasonal conditions? What statistical analyses will be completed? (634a, 634b, 634c, 3523, 3693, 1081)

COMMENT 167: Category 1 streams are to be protected from measurable changes to existing water quality. How does the Department intend to establish "existing water quality" relative to nonpoint sources? (309)

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COMMENT 168: Category 1 waters are protected from any measurable changes to the existing water quality (7:9B-1.4). A date should be established as a base line for measuring changes to water quality. Additionally, standards should be established as to how the ambient water quality conditions are to be measured, reported and made known to the public and what parameters will be used for determining the existing water quality. (677,1413)

COMMENT 169: Criteria are needed to more effectively measure "existing water quality" to then be able to calculate any "measurable changes" that may occur. (3448)

COMMENT 170: The statement, "Category 1 waters are protected from measurable changes (including calculable or predicted changes) to the existing water quality" is rather vague and may make enforcement difficult. A list of specific parameters should be included in the final amendments to the rule so that utilities can monitor for those parameters to determine if degradation is occurring. (786)

COMMENT 171: The Department should prepare and promulgate for public comment an assessment process that will be applied to establish the baseline water quality that will be used in the future to determine whether new discharges or development actions will cause a degradation of the waterbody in question. (1081)

COMMENT 172: The Department should define "existing water quality" as being that pattern of water quality concentrations caused by the reservoir operations protocol in place as of Category 1 adoption. (3425,2443,816)

RESPONSE TO COMMENTS 166 THROUGH 172:

Existing water quality accounts for previously approved wastewater discharges authorized through the NJPDES program, previously approved water transfers/withdrawals authorized through a Water Allocation Permit and existing development and the associated nonpoint source

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pollution contributions. Existing water quality will be determined through a site-specific water quality study conducted as part of the permit application process.

Point Sources: The antidegradation requirements associated with the new Category 1 designations will be imposed on applicants seeking to expand or increase the permitted flow of an existing municipal or industrial treatment works or proposing a new discharge to a Category 1 waterbody. An applicant would be required to determine existing water quality as part of their application and demonstrate that the new or expanded discharge would not result in a measurable change in water quality. The Department considers potable water intakes that pump water from a stream to a reservoir to be a tributary of the reservoir. This means that a new or expanded discharge located above a water intake must meet the antidegradation requirement of “no measurable change” at the intake. The Department will require an applicant to meet the “no measurable change” at the Category 1 boundary, if the discharge is located above a Category 1 segment or a potable water intake to a reservoir with a Category 1 designation. See Response to Comments 174-180.

Water Supply: The Department also regulates the withdrawal and transfer of water from one location to another through the New Jersey Water Allocation Program. For the purposes of implementing the antidegradation protection for Category 1, the Department considers withdraws and transfers authorized under an existing Water Allocation Permit as part of the “existing water quality.” Through the permitting process, the Department may establish a minimum passing flow to protect aquatic resources. Establishing a minimum flow condition down to which water can be safely withdrawn will balance the need to provide potable water and ensure that adequate stream flow exists to protect aquatic life uses. The Department is developing ecological based flows that will be incorporated into Water Allocation Permits in the future. Ecologically based minimum passing flows will provide better protection for aquatic life. See Response to Comments 187-198 for more information concerning water supply operations.

Nonpoint sources: The Department requires the implementation of Best Management Practices (BMPs) to address water quality/water quantity impacts associated with nonpoint source

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pollution. The Department proposed new Stormwater Management rules on January 6, 2003. 35 N.J.R. 119(a). The rule provides a framework and incentives for managing runoff by establishing a hierarchy for best management practices. To maintain and improve water quality, the Department requires applicants to integrate low impact site design techniques to maintain natural vegetation and drainage. After the design techniques are implemented the applicant must evaluate whether the performance standards are met. If the performance standards are not met, then the applicant must incorporate structural best management practices. The proposed Stormwater Management rules also provide special protections for the State's high quality waters, including drinking water reservoirs and streams that provide critical natural resource habitat, by requiring the protection of vegetated areas along Category 1 waterbodies and the upstream tributaries to the Category 1 waterbody within the same HUC 14.

The design and performance standards are intended to reduce stormwater runoff volume, reduce erosion, and maintain infiltration and groundwater recharge. The design and performance standards require site designs that, to the maximum extent practical, maintain or reproduce as closely as possible natural drainage systems, vegetation and hydrologic response, and/or eliminate or minimize the discharge of stormwater-related pollutants. The new groundwater recharge performance standard is intended to protect baseflow, stream ecology, and geomorphology while encouraging the preservation and enhancement of environmentally beneficial areas by maintaining or mimicking existing hydrologic conditions.

The Department operates several monitoring programs including the ambient water quality monitoring network, AMNET macroinvertebrate monitoring, habitat assessment, IBI fisheries assessment, and Threatened and Endangered species tracking to assess the overall condition of the State's water quality. However, in order to determine "existing water quality" for purposes of completing an antidegradation analysis, more intensive waterbody specific information developed through a Department-approved water quality study is necessary.

Point source implementation

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COMMENT 173: When the Surface Water Quality Standards were last amended (March 2001), the Department specifically deleted the anti-degradation requirement because no specific guidance or basis/background was provided on how to conduct an antidegradation study. (2919, 870,2817,935)

RESPONSE: While the Department proposed to replace the existing antidegradation policies at N.J.A.C. 7:9B-1.5(d), it did not propose to delete the antidegradation requirements. The proposed antidegradation amendments were not adopted. See 34 N.J.R. 537(a), January 22, 2002.

COMMENT 174: The current standards are protective based on the water quality criteria in place as well as the disallowance of regulatory mixing zones for point source discharges in threatened and endangered species habitat. This regulation essentially requires that any point source discharge must meet the stream limits at the point of discharge and is given no credit for mixing. This is extremely protective in light of the fact that mixing does occur in the stream further ensuring protection of the turtle species. Therefore, the re-classification of the stream is unnecessary and unjustified. (1401a,1401b)

RESPONSE: As to the comment regarding the prohibition of mixing zones for new discharges into Threatened and Endangered species habitat, the Department disagrees that the additional protection provided by Category 1 upgrade is unnecessary. The commenter is correct that the application of the no mixing zone provision results in effluent limitations that meet Surface Water Quality Criteria at the point of discharge. The Department has completed an integrated ecological assessment and determined that the identified streams qualify as Category 1. The Department believes that due to the relatively pristine conditions of some streams, limits based on the “no mixing zone” provision may still degrade water quality. The Department has determined that Category 1 waterbodies should be protected from any changes in water quality. See Response to Comments 80-84 and 209.

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COMMENT 174: The Department must clarify in this rule that the proposed regulations will not restrict current or approved flows for treatment plants, including those with outfalls located on Category 1 waterways. (1284,3074)

COMMENT 176: The commenters are concerned that antidegradation will be applied to an existing discharger, which may result in costly and time consuming water quality studies, without merit. (870,935,2817,2919)

COMMENT 177: The Department has stated that permittees will be required to maintain their existing permitted loads. What will be required of parameters that are not currently regulated? (309)

COMMENT 178: What parameters are expected to be affected and what treatment methodologies are proposed to obtain compliance? (309)

COMMENT 179: There are no facilities operating in the State which discharge to Category 1 waters, which meet all the criteria. Many facilities, which were pre-existing prior to the rule change, discharge to Category 1 waterbodies. These facilities have not been required to upgrade to meet all the constituent standards due to costs and technological concerns. Rather, they have only been required to upgrade to Best Available Technology (BAT) standards. (1401a, 1401b)

COMMENT 180: Once an existing treatment plant applies to renew its discharge permit, new more stringent criteria will be added as conditions. That will: (a) require large capital expenditures to upgrade the Plant, (b) prohibit expansion of the plant and (c) consequently inhibit all types of commercial growth in the area served by the plant in question. These costs will ultimately be borne by the ratepayers and taxpayers served by the plants in question. It will cause the Clinton East Sewer Treatment Plant, for which a permit application has been pending before NJDEP since August 1994, to be extremely expensive to build and to maintain. (3537)

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RESPONSE TO COMMENTS 174 THROUGH 180: Existing, operational facilities discharging to a Category 1 waterbody, are subject to the same regulations that govern all NJPDES surface water discharge permits. These facilities are authorized to operate up to the flow approved/authorized flow specified in their NJPDES permit.

Expansion/Rerating to Category 1: For pollutants with concentration and loading limitations, the new permit will retain the existing limits. For pollutants with concentration limits only, the new permit will establish a maximum loading based upon the current permitted flow. For all unregulated pollutants known or suspected to be present in the effluent, the new permit will establish effluent limitations for concentration and loading based upon “existing effluent quality” (N.J.A.C. 7:14A- 13.8), and the current permitted flow.

Renewal of an Existing Discharge Permit: Unless additional flow or loading is requested as part of the renewal, an antidegradation analysis is not required.

Under each of these scenarios, the Department will also evaluate the available information and regulatory requirements to establish effluent limitations such as water quality based effluent limitations, adopted Total Maximum Daily Loads, Effluent Limitation Guidelines, and Clean Water Enforcement Act.

The applicant is responsible for proposing treatment technology that will achieve the required effluent limitations. As indicated in Response to Comments 122-126 and 160-165 there may be circumstances where a new or expanded discharge to surface water may be financially or technologically impractical.

COMMENT 181: The list of “Potentially Affected NJPDES Dischargers” fails to include the many dischargers located on rivers and streams that supply reservoirs that would be reclassified Category 1 under this proposed rule. The commenter fully expects that these dischargers will be affected by the most stringent antidegradation restrictions that would be implemented to protect water bodies that were reclassified under this proposal. (1081,1284, 3074)

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COMMENT 182: Is the Wanaque South Pump Station on the Pompton River which can pump water into the Wanaque Reservoir a "potable water intake"? Are dischargers to the Passaic River upstream the confluence with the Pompton River "above" that "potable water intake"? If only a few of the wastewater treatment facilities affected by the proposed Category 1 regulations were identified, it may be argued that the notice did not provide full disclosures. (1414)

COMMENT 183: Our wastewater treatment plant discharges to the Passaic River. There are no potable water intakes for the designated reservoirs below our discharge. Will the new anti-degradation provisions apply? (3348)

COMMENT 184: The commenter is concerned that the costs and impacts of the Department's initiative are not clearly delineated and consequently informed decision-making may be thwarted. (309)

RESPONSE TO COMMENTS 181 THROUGH 184: To the extent that dischargers to Category 1 waterbodies, above Category 1 reservoirs or above potable water intakes to Category 1 reservoirs, are not proposing an expansion of their facility, they will not be subject to the new Category 1 standard. Other than the potentially affected dischargers to the streams identified in Table C of the Economic Impact Statement, the Department is not aware of any pending applications for new or expanded discharges.

COMMENT 185: The Department has greatly underestimated the economic impact of these proposed rule changes on dischargers, especially on the ability of publicly owned treatment works to meet financial obligations to bondholders and service commitments to ratepayers. This will have a severe financial impact on sewerage authorities and even on water treatment plants that have NJPDES permits. (1284,1414,3074)

RESPONSE: The new designations will not impact existing dischargers or water treatment plants complying with their permits. However, should a facility seek to increase the flow beyond

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its current permitted level in the NJPDES permit, the Category 1 standard applies. See Response to Comments 174-180.

COMMENT 186: The list of wastewater treatment technologies in Table D is not adequate to cover all potential antidegradation parameters. Reverse osmosis should be added to provide for TDS and heavy metals control if necessary. Stabilization ponds should be provided for temperature adjustment. The cost of best management practices for nonpoint source controls should also be provided in the Impact Evaluation. (1284,3074)

RESPONSE: The new antidegradation designations are expected to result in a range of economic impacts ranging from no impact to very significant costs. Wastewater treatment plants that are not expanding will not be required to install additional treatment. The Department provided capital and Operation/Maintenance costs for several readily available wastewater treatment technologies. The Department agrees with the commenter that technologies such as reverse osmosis may be needed to treat for Total Dissolved Solids and metals. The impact of Category 1 on nonpoint sources and the associated Best Management Practices (BMPs) is addressed in the proposed Stormwater Management rule. See 35 N.J.R. 119(a).

Water Supply Implementation

COMMENT 187: The Department should clarify how waterways or waterbodies that are source waters for Interbasin Transfers will be classified. (1081)

COMMENT 188: Many water purveyors that operate reservoir systems divert water to the reservoirs or to streams tributary to the reservoirs from sources outside the watershed basin of the reservoir, such as, interbasin transfers. The current proposal should be clarified to address the sometimes overriding need for these interbasin transfers, current and future, to meet the water supply needs of New Jersey. The fact that the source waterbody may be of lesser quality than the receiving waterbody should not prevent these inter-basin transfers. Since such sources are considered tributary to the reservoir and are to receive the same protection as the receiving

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waterbody (N.J.A.C. 7:9B-1.5(d)8), the onus to meet the anti-degradation requirements should fall on the treatment plants discharging upstream of water intakes. (677,1413)

COMMENT 189: The Department should specify in the rules or the "response to public comments" that the application of Category 1 status to the Round Valley Reservoir will not cause an alteration in the reservoir operations for the purpose of public water supply (up to the full safe yield of the system), but rather is intended to impose nondegradation status for the South Branch of the Raritan River at the Hamden Pumping Station so as to protect reservoir water quality from degradation of the South Branch of the Raritan River. Further, the Department should make clear that the water authority will not be required to stop pumping to the reservoir if water quality in the river degrades due to upstream activities over which the water authority has no control. (816,2443,3425)

COMMENT 190: The Department should specify in the rules or the "response to public comments" that the application of Category 1 status to the Manasquan Reservoir will not cause an alteration in the reservoir operations for the purpose of public water supply (up to the full safe yield of the system), but rather is intended to impose nondegradation status for the Manasquan River at the Hospital Road intake so as to protect reservoir water quality from degradation of the Manasquan River. (816,2443,3425)

COMMENT 191: The water quality of the Pompton River and Passaic River are generally of a lower quality than the water in the Wanaque Reservoir. Similarly, the water quality of the South Branch Raritan River is of a lower quality than the water in Round Valley Reservoir. The Department must clarify this proposed rule so that it accounts for similar situations where a Category 1 reservoir is served by a river or stream that is not Category 1. (1284,3074)

COMMENT 192: Transfers that are currently in place should be identified as contributors to the existing/baseline conditions of the newly designated Category 1 waterbody. (1081)

COMMENT 193: In the case of "pump storage" reservoirs such as the Manasquan and

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Glendola, would the introduction of water from the rivers, the Manasquan and Shark Rivers in these instances, potentially constitute prohibited degradation if the quality of water in the river were less than that in the reservoir? This could be the case if relatively lower flow levels increase the pollutant loading by reducing the volume of water in which it is contained. Is this the intent of the regulation? If not, the language must be changed. (798)

COMMENT 194: The Department has not addressed the fact that pumped storage water supply reservoirs are different from other waterbodies that have been classified as Category 1 and has not defined how water purveyors will address the impacts of their day to day operations vis-à-vis the new Category 1 classification. (3693)

COMMENT 195: The commenter recommends that the Department specify in the rules or the "response to public comments" that the application of Category 1 status to the Timber Swamp Brook will not cause an alteration in the Manasquan Reservoir operations for the purpose of public water supply. (816,2443,3425)

COMMENT 196: The Department should make clear that water authorities will not be required to stop pumping to the reservoir if water quality in the river degrades due to upstream activities over which the water authorities have no control. (816,2443,3425)

COMMENT 197: It should be clarified that it is not the intent of these proposed regulations to eliminate the pumping of water from the Pompton River into the Wanaque Reservoir, even though that pumping will degrade the Wanaque Reservoir quality, as the water is required to meet the potable water demands of the NJDWSC system. (1414)

COMMENT 198: The Department should clarify in the rules or specific implementation policies that the Category 1 designations will not interfere with the operation of the reservoirs as water supply facilities. Given that the Category 1 status is intended to provide additional protection to New Jersey's water supply facilities, it would be unfortunate if the SWQS inadvertently reduced the safe yields available to Central New Jersey (and any other regions with

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similar reservoir operations). There is nothing in the SWQS proposal to indicate a desire by the Department to modify operations of the reservoir systems, but the proposal also does not make clear that operational modifications will not be needed. (816,2443,3425)

RESPONSE TO COMMENTS 187 THROUGH 198: The Department considers withdrawals and transfers authorized under an existing Water Allocation Permit as part of the “existing water quality” for the purposes of implementing the antidegradation protection for Category 1. This includes Interbasin Transfers of water. The antidegradation designation of source waters subject to water transfers is not impacted by this action; the Category 1 boundary for a Category 1 reservoir is at the point of diversion or intake. See Response to Comments 166-172. The Department regulates the withdrawal and transfer of water from one location to another through the New Jersey Water Allocation Program. The water purveyors will be authorized to continue pumping and transferring water up to the volume specified in their Water Allocation Permits which will ensure that the calculated safe yield will be maintained. Through the Water Allocation permitting process, the Department may establish a minimum passing flow based upon 125,000 gallons per day per square mile of watershed to protect aquatic resources. Establishing a minimum flow condition down to which water can be safely withdrawn will balance the need to provide potable water and ensure that adequate stream flow exists to protect aquatic life uses.

The intent of this initiative is to maintain the existing water quality and prevent any degradation of water supply reservoirs. As a result, existing water management regimens are not intended to be impacted. The Category 1 designation signifies the Department’s intent to prevent any lowering of water quality. This can be achieved by ensuring that waterbodies that are tributaries to reservoirs are protected from water quality changes at the point of diversion for transfers or at the point where the water enters the reservoir for natural drainage.

As indicated in the Response to Comments 166-172, existing discharges, water withdrawals and transfers, and existing development are factors in the Department’s determination of “existing water quality.” New and expanded discharges and development activities will be required to

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meet higher standards as a result of the new Category 1 designation. Activities that would result in a change in water quality at the point of diversion would be impacted and would have to demonstrate compliance with the “no measurable change” standard applicable to Category 1 waterbodies.

The Department notes that emergency powers are established within the Water Supply Management Act, N.J.S.A. 58:1A-1 et seq., and the Disaster Control Act, N.J.S.A. App. A:9-33 et seq.. This authorizes the Department to take whatever steps are necessary and proper to alleviate the water emergency.

In addition to the current passing flow requirement, the Department is conducting research into a methodology to estimate the minimum flows needed in streams to protect aquatic life. These minimum flows typically occur during dry weather or drought conditions. Allowing flows in a stream to regularly fall to drought levels causes has the potential to cause severe ecological stress that can modify the ecology.

COMMENT 199: In 1986, North Jersey District Water Supply Commission (NJDWSC) concluded that the quality and quantity of the Two Bridges Sewerage Authority (TBSA) discharge and Pompton River justified construction of NJDWSC Wanaque South Pump Station at a point just downstream of the TBSA treatment facility discharge. These studies concluded that the diversion of the Pompton River water, including the TBSA's discharge, would not have a significant adverse impact upon the Pompton River or Wanaque Reservoir. The commenter is not aware of any more recent studies documenting water quality impairments or potable water use impairments in the Wanaque Reservoir. Therefore, it would be arbitrary to reclassify the Wanaque South Pump Station and its tributary area to Category 1, without any demonstration that such actions are warranted to attain the level of quality required for potable water uses. (309)

COMMENT 200: The proposal notes that New Jersey's population is going to grow and some of these new people may live near reservoirs. The proposal concludes that with the increased

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population will come increases of pollutant loadings to the waters of the State. Has the Department determined that these drinking water supplies are in any way threatened? The Department is guessing that increases in population will pollute waters and impact these reservoirs. This is not adequate justification for Category 1 designation. (2520)

COMMENT 201: The proposal does not provide any justification for increasing protection of these waters. There is no evidence provided that these waters are being impaired. Other regulations are providing these sources of drinking water with more than adequate protection. (2520)

RESPONSE TO COMMENTS 199 THROUGH 201: The Department's decision to designate water supply reservoirs as Category 1 is not based upon a determination that current water supply use is impaired. The upgraded antidegradation designation reflects the Department's determination that increased protections are necessary to protect the existing use as future development occurs. The upgraded antidegradation designation will protect these reservoirs from future water quality impacts resulting from increased development in watersheds that drain both naturally and as a result of water transfers. The recent drought experiences and the long-term concerns justify the added protections for water supply reservoirs. This protection is intended to ensure that the citizens of the State continue to enjoy clean and plentiful supplies of drinking water.

COMMENT 202: Category 1 designation of waterbodies used for public water supply purposes should not adversely affect current and future water treatment plant operations. Water purveyors withdraw water, treat for distribution and then discharge decant water from filter backwashes, along with other treatment process water back to waterbodies now proposed for Category 1 protections. The proposed Category 1 designation of reservoirs and rivers used for public water supply should not hamper the ability of water purveyors to provide adequate supplies of drinking water. (677,1413)

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RESPONSE: The Department recognizes that water purveyors operate water treatment facilities and that these facilities may discharge wastewater under a NJPDES permit. As stated in Response to Comment 174-180, the antidegradation requirements will be imposed upon new/expanded wastewater dischargers. Water purveyors will be authorized to discharge up to the levels permitted for flow and pollutant loading in their NJPDES permit in effect at this time. A water purveyor seeking to increase its wastewater discharge to a Category 1 waterbody will be required to meet the same standards applicable to any wastewater discharge.

COMMENT 203: The operation and maintenance of a water supply reservoir involves facilities and practices, which are critical to the operation. Those structures and procedures have impacts on the water quality that, although short in term, might potentially not meet the intent of the Category 1 criteria. However, they must be permitted to efficiently utilize the source for water supply purposes. The installation and maintenance of intake facilities, dams, spillways, embankment rip rap, weed control and even dredging should be exempted from the regulation. (786)

COMMENT 204: Each of the reservoirs proposed to receive the Category 1 designation are in rather advanced states of eutrophication, due largely to the significant input of soluble forms of nitrogen, phosphorous and organic materials over time. As such, each of these reservoirs experiences significant algal blooms generally during the May through September time frame. Because these algae interfere with the treatment process at the drinking water treatment plants, it is necessary to apply a State-approved algacide in an effort to control the algal population density. These algacides, including copper sulfate and cutrine, are applied when necessary to prevent degradation in treatment plant performance as well as prevent formation of objectionable taste and odor-causing compounds in the drinking water supply. The Department should specify that the Category 1 designation will not prevent water purveyors from utilizing these algacides as deemed necessary, so they can continue to provide a high quality water supply to the communities that they serve. (786)

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RESPONSE TO COMMENTS 203 THROUGH 204: The purpose of the Category 1 protections is to prevent a lowering of water quality. The Department agrees that short-term, temporary activities that do not have long-term impacts on water quality, particularly activities associated with water supply management, should not be precluded by the Category 1 designation. However, approval from the Department is required before any such activities may be undertaken and the applicant must demonstrate that the short-term, temporary activities will not result in a long term lowering of water quality.

Aquatic pesticides are routinely applied to control the growth of algae and aquatic weeds in lakes, ponds and reservoirs. As indicated by the commenter, reservoirs are treated to prevent the formation of objectionable taste and odor causing compounds in drinking water. All pesticides approved for use are registered for such use by the US Environmental Protection Agency. The Department has determined that the application of aquatic pesticides to control algae and aquatic weed growth may result in short-term temporary water quality impacts. The Department will continue to restrict the rate, time, and location of pesticide application through the Aquatic Pesticide Use Permit process. These controls are designed to ensure that the impacts are short-term and temporary while reducing nuisance impacts that would occur without treatment. The Department believes that this strikes an appropriate balance between ensuring clean water supplies and the protection of water quality.

COMMENT 205: The Department needs to determine what impact this proposed requirement would have on determining future designated uses of waterbodies. (1081)

RESPONSE: The Department does not anticipate any changes to the existing or designated uses as a result of the change in antidegradation designation. This action will clearly maintain the existing and designated uses.

COMMENT 206: The Department should specify how the water quality impacts associated with future water supply projects such as the Confluence Pumping Project will be addressed at Category 1 reservoirs. The Department could consider an allowance for future water supply

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projects that are endorsed by the Department in the Statewide Water Supply Plan to ensure that the water quality of the influent water is no lower than it would be if the water supply project were operational at the current time. This could be accomplished by imposing Category 1 status on the source water body or developing a pro-active TMDL for the affected waterbody. (816, 2443, 3425)

COMMENT 207: The Department needs to determine how it will address future transfers in the Water Supply Master Plan, including whether operators of water supply systems, either receiving or sending, would be required to conduct additional treatment of transferred water. What impact would any such requirement for additional treatment have on the Department's economic analysis of this Rule Proposal? (1081)

RESPONSE TO COMMENTS 206 THROUGH 207: At the present time, the Department does not believe that future transfers that would not result in a change in water quality to the Category 1 reservoirs would be impacted. All freshwaters are protected as potential sources of public water supply. Therefore, until a new intake is proposed, the Department believes that the current Surface Water Quality Standards adequately protect the water for this use.

COMMENT 208: The Department should clarify its approach by using the same boundaries as N.J.A.C. 7:9B-1.5(h)1viii, which prohibits the use of mixing zones within 1500 feet upstream and 500 feet downstream of potable surface water intakes. Such a policy would be more protective than applying the policy at the intake point itself, but would not create a new boundary from the existing policy. (816, 2443, 3425)

RESPONSE: The Department has proposed to upgrade the antidegradation designation for 9 potable water reservoirs. Pursuant to N.J.A.C. 7:9B-1.5(d)8, a waterway or waterbody from which raw water is transferred to another waterway or waterbody is treated as a tributary to the waterway or waterbody receiving the transferred water. The upgraded antidegradation designation established for these reservoirs creates Category 1 boundary conditions at the surface water intake. The commenter has suggested that the Department consider expanding the

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Category 1 designation to 1500 feet upstream and 500 feet downstream of a surface water potable water intake, essentially at the edge of the mixing zone provided in the Surface Water Quality Standards. The mixing zone provision requires that water quality criteria are met at the edge of the mixing zone: in the case of water intakes, this point is 1500 feet above and 500 feet downstream. In addition, as a result of this action, a new or expanded discharge would have to also demonstrate the “no measurable change” standard for Category 1 at the intake. The Department believes that this is an appropriate level of protection.

COMMENT 209: The Wanaque Reservoir receives a substantial diversion from the Pompton and Passaic Rivers in addition to diversions from the Ramapo River. These diversions are also directed out-of-basin into the Hackensack watershed to supplement the water supply of the Oradell Reservoir. The intakes of these water supply reservoirs, in particular, those used to refill the Wanaque and the Oradell, are located in areas where water quality has been severely impacted. The Wanaque Reservoir's intake at Two Bridges is located downstream of multiple wastewater treatment discharges with over 60 mgd (cumulative) of treated effluent discharges. Almost 10% of this discharge load originates within New York State. The proposed Category 1 rule is silent with respect to the diversion of degraded waters into these supply reservoirs. In the Passaic Basin, as a result of a court order settlement, the dischargers were directed to maintain Existing Effluent Quality (EEQ) with very liberal nitrogen and phosphorous limits until such time when a watershed management plan is developed for the Passaic Basin. Needless to say, the Department ignored many of the issues related to the protection of habitats for threatened and endangered species in the central Passaic Basin when it reached a settlement with the dischargers, with no regard to the influences of such dischargers on the water quality of the streams. (2434)

RESPONSE: The purpose of Category 1 protections is to prevent the lowering of water quality. As indicated in Response to Comments 166-172, existing discharges, water withdrawals and transfers, and existing development are accounted for in the determination of “existing water quality.” The Department proposed to upgrade the antidegradation designation for the Wanaque Reservoir due to its water supply significance.

The Department acknowledges that the water quality in the Pompton River and Passaic River are substantially different than the existing condition of the Wanaque Reservoir. The Department has determined that the concentrations of phosphorus in some sections of the Passaic River basin are excessive and is working to establish a Total Maximum Daily Load (TMDL) to address phosphorus in these waterbodies. It is possible that, as a result of TMDL work in the New York-New Jersey Harbor, additional controls on wastewater treatment plants may also be necessary for nitrogen. The Department executed agreements with 18 dischargers in the Passaic River Basin between January 2000 and March 2003. The agreements are an interim measure that capped the amount of phosphorus that could be discharged to the Passaic River while the Department developed the phosphorus TMDL.

The Department has not ignored issues related to the protection of habitats for threatened and endangered species in the Passaic River Basin. Most of the facilities were constructed prior to the 1973 passage of the New Jersey Endangered and Non-game Species Conservation Act, N.J.S.A. 23:2A-1 et seq. As a result, wastewater dischargers existed long before the Department began documenting the presence of Threatened and Endangered (T&E) species. The Department began work on a pro-active, ecosystem-level approach for the long-term protection of rare species and their important habitats in New Jersey known as the Landscape Project in 1994. The goal of the Landscape Project is to protect New Jersey's biological diversity by maintaining and enhancing rare wildlife populations within healthy, functioning ecosystems. The Department can now use the Landscape Project maps to identify critical rare species habitats based on land use classifications and rare species locations. With this new information, the Department can better protect T&E species and their habitat. The Department has provided additional protections in the Surface Water Quality Standards as a result of a formal consultation between the USEPA and the USFWS pursuant to Section 7 of the Endangered Species Act. 16 U.S.C. 1531 et seq. These protections included a prohibition on mixing zones in T&E habitat. For new discharges, the mixing zone is prohibited from extending into T&E habitat pursuant to N.J.A.C. 7:9B-1.5(h)1viii and mixing zones may be restricted if T&E habitats downstream of the mixing

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zone will be adversely impacted pursuant to N.J.A.C. 7:9B-1.5(h)5iv. An existing discharger will be allowed to maintain an existing mixing zone.

COMMENT 210: The Department indicates that water purveyors have had to invest money to meet increasingly protective drinking water standards. Increasing drinking water standards have nothing to do with the existing water quality and are irrelevant to this discussion. (2520)

RESPONSE: The Department has determined that these protections are necessary and appropriate to ensure the citizens of the State continue to be provided with clean and plentiful water. One way to achieve this goal is to preserve the water quality of water supplies. The Department's decision to upgrade the antidegradation designation of these reservoirs is based upon the need to protect our water supplies from further water quality degradation. The Department believes it is necessary to protect our source water to ensure that more protective drinking water standards are met. Protecting the State's water supplies from degradation will help to control the cost of supplying potable water while meeting ever increasingly protective standards.

COMMENT 211: The stormwater management rule is proposing the establishment of 300 feet buffers on both sides of Category I water bodies. This will restrain the use of land in the 300 feet buffer. The NJDA is prepared to work with the Department to minimize the impact on farmers through the Farmland Preservation and Conservation Cost Share programs as well as the proposed Conservation Reserve Enhancement Program (CREP). It might be more appropriate to utilize the Natural Resources Conservation Service (NRCS) standards for the buffer width based on soil type, slope, erodibility, vegetation and other environmental factors instead of the fixed value of 300 feet for all sites. (2728)

RESPONSE: The Department is working closely with the New Jersey Department of Agriculture and Natural Resources Conservation Service (NRCS) to ensure that resources are available to farmers to address potential nonpoint source pollution related to existing agricultural practices. Examples of these efforts include the proposed New Jersey Conservation Reserve

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Enhancement Program (CREP) program, the use of State Corporate Business Tax (CBT) funds to augment Federal Environmental Quality Incentives Program (EQIP) funds and coordination through the State Technical Committee to ensure that funded conservation practices that address an existing impairment are prioritized.

COMMENT 212: The Agricultural Impact Statement of the proposal states that no known permitted agricultural discharges exist currently, but it is possible that some agricultural operations may soon be brought under regulation of the NJPDES permit through the Concentrated Animal Feeding Operations (CAFO) general permit. (2728)

COMMENT 213: It appears that nonpoint source controls will be necessary to protect the designated water bodies. The Department should reconsider the need for controls on agriculture runoff quality. The commenters do not believe that agriculture should be excluded “because agriculture does not generally require a NJPDES permit.” (1414, 3348)

RESPONSE TO COMMENTS 212 THROUGH 213: The new Category 1 designation will be imposed on new and expanded activities. For this reason, the Department believes that the Agricultural Impact Statement was correct. The issuance of a NJPDES permit to an existing agricultural operation pursuant to the general permit for Concentrated Animal Feeding Operations (CAFO) is intended to improve water quality. These operations, while permitted through the NJPDES program, are not expected to be directly impacted. However, a new CAFO located near or above a Category 1 waterbody will be required to implement measures to ensure that the new activity does not result in a measurable change in water quality.

COMMENT 214: Will nonpoint sources be required to maintain that load predicted during storm events while wastewater treatment plants will be required to maintain their existing permitted load calculated based upon critical low flow conditions? (309)

RESPONSE: New development that results in discharges of nonpoint source pollution is required to implement best management practices that achieve a water quality performance

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standard as established by the Department. In general, new development runoff control requirements are currently related to detaining the water quality design storm. The Stormwater Management Rules proposed by the Department in the New Jersey Register on January 6, 2003 (see 35 N.J.R. 119(a)) include new water quality performance standards for runoff control for new major development. On all regulated sites, these proposed water quality protection requirements address Total Suspended Solids and Nutrients. In addition, a new special water resource protection measure requiring the maintenance of a 300 foot vegetated riparian buffer has been proposed for Category 1 waterbodies and tributaries to the Category 1 waterbody in the same HUC 14 in order to provide additional protections for Category 1 waters.

TMDLs

COMMENT 215: The Department needs to explain how the proposed Category 1 regulations will be integrated with the watershed process particularly the development of TMDLs. The commenter believes that TMDLs provide a means of implementing the goals of antidegradation. (3348)

COMMENT 216: The commenter is committed to a process that would develop appropriate limitations for its facility, based on a watershed approach through the Total Maximum Daily Loads (TMDL) process. Efforts to more effectively implement the TMDL process should be considered in place of a regulatory approach that leaves many unanswered questions. The TMDL process will identify the extent and cause of water use impairment, if any, and define the appropriate remedial measures, which could include reduction of the load of a pollutant to the reservoir or which may identify other avenues to address these concerns. (309)

COMMENT 217: Watershed planning is underway throughout the State of New Jersey. The Department should discuss in the proposed Category 1 regulations how that designation will be integrated with the watershed process. The development of TMDL's within watersheds, such as the Passaic River, will provide a means of implementing the goals of antidegradation. (1414)

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COMMENT 218: The Shark River is on the Department 303(d) impaired waterways list. Not only is its water quality contaminated by heavy metals and bacteria from leaking sewage collection systems but additional problems like sedimentation from improperly controlled construction sites and PCB pollution from an old Army base as well as upstream industrial sites are adding to the Rivers problems. There is much work to be done on this River. The Glendola Reservoir is not the only surface water body in the Shark River watershed that supplies drinking water for Monmouth County residents. New Jersey American Water Company (NJAWC) operates an intake pumping station on the Shark River at Remsen Mills Rd on the border of Wall and Neptune townships. NJAWC also operates its Neptune Water Treatment facility on Old Corlies Ave in Neptune. It is interesting to note that the commenter does not use this intake at certain times because of sedimentation and an increase in Total Suspended Solids due to upstream development. (1370)

RESPONSE TO COMMENTS 215 THROUGH 218: Total Maximum Daily Loads (TMDLs) are required where the waterbody does not meet the surface water quality standards for a particular parameter and is therefore considered impaired. A TMDL establishes a plan for returning the waterbody to compliance with the surface water quality standards. As a practical matter, TMDLs are required where water quality has been degraded, while the Category 1 antidegradation designations emphasizes the prevention of degradation by protecting against changes in water quality. The Category 1 designation provides broader water quality protections because it is intended to prevent changes in water quality rather than the limited parameters addressed through the TMDL process.

COMMENT 219: A Watershed Management Plan should be developed to address the specific needs of the Wanaque Reservoir and the watershed, and that a plan be devised to acquire and manage the resources available to address those needs. (309)

RESPONSE: Although the recommendation to develop a Watershed Management Plan is beyond the scope of this rule, this rule does not preclude the development of a watershed management plan. The upgraded antidegradation designation for the Wanaque Reservoir to

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Category 1 will provide additional protections in the watershed to prevent further water quality degradation. A Watershed Management Plan that is developed to meet this standard remains a viable option.

COMMENT 220: Standards are a useful tool to accomplish the multi-disciplined job of water quality improvement and nondegradation. While these long overdue Proposed Amendments are a good first step they must be viewed in light of the entire realm of water quality issues. With out a simultaneous strengthening of the Department enforcement of these Standards then this effort will be for naught. The commenter would like to see stepped up, measurable enforcement on the Shark River of all water quality Statutes and Regulations pertaining to these Standards. Protecting drinking water supplies is clearly the most important thing we can do and is rightfully prioritized as your first step. Increased enforcement of these Standards both in point and nonpoint pollution controls must be implemented as the two sides of the same coin. (1370)

COMMENT 221: Rules are only as good as the enforcement. The commenter commends this administration's commitment to enforcement of State environmental regulations. The commenter strongly urges the Department to monitor and enforce all regulations protecting water supply and wildlife habitat. (3252)

COMMENT 222: Strategies and tasks need to be developed outlining how and who will enforce the Category 1 standards. (3448)

COMMENT 223: The Department should clarify how these new standards will be enforced. (677,1413)

COMMENT 224: The Department should enforce existing water quality standards under the current anti-degradation policy. (3448)

RESPONSE TO COMMENTS 220 THROUGH 224: The antidegradation policies are generally applied through the permitting programs, most notably the NJPDES wastewater

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discharge permitting program. The standard is applied through the permit application review process and will result in the establishment of effluent limitations that meet the antidegradation requirements. Failure to comply with those effluent limitations may result in enforcement actions including monetary penalties.

COMMENT 225: There are activities which, occur in Category 1 rivers and reservoirs that should be permitted and monitored as exceptions to the intent. The type of Non-Drinking water source related activity contemplated is: boating; swimming; fishing; and erection, maintenance and replacement of public and private docks. Although not routinely anticipated to be deleterious to drinking water supplies, their existence should be permitted by a controlling regulation, with their activity controlled or mitigated, to meet the intent of the Category 1 designation. (786)

COMMENT 226: There is great concern for the potential impacts the Category 1 designation can potentially have on the ability of government agencies to carry out necessary tasks ranging from road and bridge work, to ditch cleaning to mosquito control work. As the number of waterbodies designated as Category 1 expands, the potential for creating conflicts will increase. It is therefore essential that a simple, consistent waiver process be put in place that will exempt necessary activities of government. Such exemptions and waivers are included in the proposed N. J. A. C. 7:8- 5.2(d) and (e). (798)

COMMENT 227: There are serious implications for future regulatory restrictions that may be applied to Category 1 designated waters. The Category 1 designation can negatively impact the ability of government agencies to carry out necessary tasks; it is essential that a simple, consistent waiver process be put in place that will exempt the necessary activities of government. (3109)

COMMENT 228: The Department should re-examine the State's antidegradation policies and define how they will be applied to protect New Jersey's water resources and the various uses for which they are designated. (3693)

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COMMENT 229: The Department should hold off on implementing this policy until the regulated community has had an opportunity to provide peer review and comments on how the Department plans on implementing antidegradation, (935, 2817, 2919)

RESPONSE TO COMMENTS 225 THROUGH 229: The commenters are requesting changes to the antidegradation implementation procedures at N.J.A.C. 7:9B-1.5(d). The Department did not propose amendments to the antidegradation implementation policies; therefore, these comments are beyond the scope of this rule. The Department intends to evaluate implementation policies and propose amendments as part of a future rulemaking.

COMMENT 230: Will the antidegradation policies be applied to a project within approved wastewater management plan services areas? (1414)

COMMENT 231: Will the antidegradation requirement be applied to all or some projects within individual septic system areas? (1414)

RESPONSE TO COMMENTS 230 THROUGH 231: The new antidegradation designation applies to new and expanded discharges. If the wastewater treatment plant has available capacity to accommodate a new project within its approved sewer service area, an antidegradation review would not be imposed on the wastewater treatment plant. However, other requirements based upon the new Category 1 designation, such as the 300 foot buffers required by the proposed Stormwater Management rule would be imposed on the development project. January 6, 2003 35 N.J.R. 119(a).

COMMENT 232: Does the Department believe that the proposed stormwater regulations will support the antidegradation policy? If yes, then the stormwater regulations should be referenced in the proposed Category 1 regulations. (1414)

RESPONSE: The comment is beyond the scope of this action. This action identified

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waterbodies that qualify as Category 1 waterbodies. Additional proposals identifying other Category 1 waterbodies are discussed in Response to Comments 51-63. Other regulatory initiatives such as the stormwater planning proposal discussed how those programs utilize the Category 1 designation. The Department believes that the stormwater proposal will help prevent water quality degradation due to nonpoint sources. Therefore, the Department disagrees with the suggestion to reference the stormwater rules as part of the waterbody listing process.

COMMENT 233: The equal protection of upstream bodies may be necessary in order to achieve the "anti-degradation" requirements for the proposed water bodies. There should be consistency with the proposed N.J.A.C. 7:8 - 5.5(h) in terms of waters covered by the regulations. (798)

RESPONSE: The commenter has referred to the implementation of the special water resource area protections included in the proposed Stormwater Management rule. In addition to Category 1 waterbodies, the special water resource area protection also applies to tributaries upstream of the Category 1 waterbody within the same HUC 14. The Department will evaluate extending Category 1 designation to additional waterbodies as part of the overall process. See Response to Comments 51-63.

COMMENT 234: Very few wastewater treatment plants are identified as being affected by the proposed Category 1 designations. This implies that a majority of the control efforts must come through nonpoint source and stormwater controls. The integration of these proposed Category 1 regulations and the proposed stormwater regulations should be considered. (3348)

RESPONSE: The Department recognizes the need to protect Category 1 waters from nonpoint sources of pollution and has proposed a special water resource protection measure, a 300 foot vegetated riparian buffer to provide additional protections of these waters from new major development. (See 35 N.J.R. 119(a)). See Response to Comments 212-214. New and expanding point sources could be impacted as well if the discharge is to a stream or reservoir upgraded to Category 1.

Nominations

Several commenters provided information, which supports the Department conclusion that these waterbodies qualify for Category 1 designation. Several commenters nominated additional waterbodies to receive Category 1 designation. Several commenters recommended that tributaries to the Category 1 waterbodies identified in this action should also receive Category 1 protection. The following waterbodies were nominated:

1. Delaware River at the Delaware Raritan feeder canal at Bull's Island
2. Main stem of Delaware Raritan canal and Feeder canal.
3. Ambrose Brook in northern Middlesex County, Piscataway area;
4. Doty's Brook in northern Middlesex County, Piscataway area;
5. Bound Brook, northern Middlesex County;
6. Green Brook, northern Middlesex County and southern Union County
7. Raritan River
8. Splitrock reservoir and Feeder streams for drinking water reservoirs
9. Surface waters within sensitive watershed regions like the highlands and the Pinelands.
10. Upper Hackensack
11. Tappan reservoir and feeder streams
12. Woodcliff Lake and feeder streams
13. Oradell reservoir and feeder streams
14. Pascack Brook
15. Sandy Hook Bay
16. Highlands region
17. Headwaters of Cooper and Rancocas Creek
18. Metedeconk River and its associated reservoir
19. Rancocas Creek
20. Great Brook (Great Swamp)
21. Headwaters of Great Swamp
22. Ramanessin drainage
23. Headwaters of Swimming River
24. Manasquan River and tribs.
25. Turkey Swamp Brook
26. Debois Creek
27. Marsh Bog Brook
28. Mingamahone Brook
29. Stan Brook
30. Manasquan Estuary
31. Belcher Creek (W. Milford) and Pequannock River (W. Milford and Kennelon)
32. Newton Town reservoir 33. Headwaters of Boonton reservoir
33. Shark River
34. Passaic River from source in Mendham downstream through Osborn Pond and through the Great Swamp National Wildlife Refuge to the Davis bridge on Maple Avenue near Millington.

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- 35. Delaware & Raritan Canal
- 36. Tribs. to Delaware from Del. Water Gap to Washington Crossing
- 37. Inner and Outer Atlantic Coastal Plain
- 38. Flat Brook
- 39. Pequest River

The Department evaluated the impacts associated with the proposed action and did not extend that evaluation to the consideration of upstream tributaries of the identified waterbodies. The Department is required to propose these upgrades through rulemaking. Therefore, no action is being taken on these additional nominations at this time. The Department has provided the public with an opportunity outside the scope of this rulemaking to nominate waterbodies for Category 1 designation as well as an internal process of nomination by the Department's natural resource management programs. The Department has published a Notice of Opportunity for Public Comment in the New Jersey Register at 35 N.J.R. 1308(b) on March 3, 2003 seeking comment on the BIG Map and additional waters to be considered in a future rulemaking. Additional information is available on the Department's website at www.state.nj.us/dep/antisprawl.

Comments beyond the scope of the proposal

The following is a list of comments that were beyond the scope of the November 18, 2002 rule proposal. The Department could not adopt these suggested changes without first proposing them for public comment. The Department will evaluate these comments in determining what changes to the rules might be appropriate for proposal in the future.

COMMENT: Encourage growth and redevelopment of cities before spreading to the suburbs. Implore the Commissioner to have the courage to make the tough decisions and protect our children's future.

COMMENT: Urban sprawl requires inordinate amounts of infrastructure financing from governments, drawing wealth away from more ecologically and economically sound smaller

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communities. Encouraging industries and populations to spread out into smaller communities, mindful of wilderness conservation, has additional national advantages such as:

- Reducing the heavy concentration of electrical energy loads and the attendant technical problems for distributing, generation peak demand and associated failures plus opportunities to employ renewable resources. Other services such as water, sewage, and sanitation would have facilities on a smaller scale and able to handle site specific conditions more effectively
- Better chances of survival as a nation in the event of attacks with weapons of mass destruction
- More effective use of the interstate highways, railways and modern telecommunications resulting in greater national productivity
- Reduction in dangerous concentrations of pollutants for better management and disposal.

COMMENT: New Jersey's waterway is rife with pollution. The amount of chlorine added to water supply is a problem in its own right. The chlorine reacts with organic material in the water to produce trihalomethanes (THMs).

COMMENT: The drawdown will reduce the flow of many Pine Barrons streams and water tables in that vicinity. The volume of drawdown of ground water proposed in Manchester Township will have a negative impact on the life of many plant species including several rare or endangered species well known to be of concern to the Department.

COMMENT: Restrict sewers and roads in environmentally sensitive areas.

COMMENT: NJDEP has failed to conduct federally mandated cleanup plans at New Jersey's 1,042 waterways that do not meet water standards for pollutants like fecal bacteria, mercury, lead, arsenic, and cyanide. Please make this your highest priority.

Federal Standards Analysis

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Executive Order 27 (1994) and N.J.S.A. 52:14B-1 et seq. (P.L. 1995, c.65) require that State agencies which adopt, readopt, or amend State regulations that exceed any Federal standards or requirements include in the rulemaking document a Federal standards analysis.

The Federal Clean Water Act (CWA), 33 U.S.C. 1251 et seq., as amended by the Water Quality Act of 1987 (PL 100-4) requires the establishment of water quality standards for all surface waters of the United States. (The Water Quality Act of 1987 amended the CWA to require the adoption of criteria for toxic pollutants identified as causing or contributing to an impairment of a waterbody's designated use(s).) Individual states are given the primary responsibility for developing and adopting surface water quality standards applicable to their waters. The USEPA is given responsibility to oversee and approve state water quality standards, provide guidance on the content of the standards and to develop water quality criteria guidance documents. Key elements of the surface water quality standards program required under the CWA are: a classification system establishing designated beneficial uses of the waters; ambient water quality criteria necessary to protect those uses; minimum uses to be attained, which reflect the fishable and swimmable goals of the CWA; and antidegradation policies and implementation procedures to prevent water quality from deteriorating. Furthermore, the CWA includes provisions requiring the USEPA to promulgate superseding Federal standards where the USEPA concludes that a State's standards are not consistent with the requirements of the CWA or where Federal requirements are necessary to meet the requirements of the CWA.

The SWQS amendments being adopted are required by and consistent with the Federal statutes, regulations and guidance. The Department has prepared the following section by section analyses of the SWQS for purposes of comparing each section with the applicable Federal law, regulations and guidance, as required under Executive Order 27 (1994) and P.L. 1995, c. 65.

N.J.A.C. 7:9B-1.15 contains specific waterbody classification listings and antidegradation designations, arranged by major drainage basin, and instructions for the use of the classification tables. The Federal water quality regulations at 40 CFR 131.10 require that

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states specify appropriate water uses to be achieved and protected. The Department's SWQS waterbody classification listing is a tool to identify these designated uses such as protection and propagation of fish, shellfish, and wildlife, recreation in and on water, public water supplies, agricultural, industrial, etc. Therefore, these waterbody classifications are consistent with the Federal regulations.

In addition, 40 CFR 131.12 establishes requirements for the states to develop and adopt antidegradation policies and implementation procedures to ensure that the level of water quality needed to protect existing uses is maintained, and that water quality better than necessary to protect existing uses is maintained and protected unless demonstrations are made in support of lowering the water quality. The adopted changes in antidegradation designation for the 15 waterbodies identify the level of protection and implementation procedures that must be followed. The antidegradation designations are consistent with and do not exceed Federal standards, therefore, no further analysis is required.

Full text of the adoption may be found in the New Jersey Administrative Code at N.J.A.C. 7:9B.

Full text of the adopted amendments follows (additions to proposal indicated in boldface with asterisks *thus*; deletions from proposal indicated in brackets with asterisks *[thus]*): (No change from Proposal)

Based on the consultation with staff, I hereby certify that the above statements, including the Federal standards analysis addressing the requirements of Executive Order 27 (1994), permit the public to understand accurately and plainly the purposes and expected consequences of this adoption with amendments. I hereby authorize this adoption with amendments.

Date: _____

Bradley M. Campbell, Commissioner
Department of Environmental Protection

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**DEPARTMENT OF ENVIRONMENTAL PROTECTION
LAND USE MANAGEMENT
WATER MONITORING AND STANDARDS
Surface Water Quality Standards N.J.A.C. 7:9B
Adopted Amendments: N.J.A.C. 7:9B-1.15**

DEP Docket No. 28-02-10/347

Proposal published November 18, 2002, at 34 N.J.R. 3889(a)

List of Commenters (for page 3 of adoption document):

number	Last Name	First Name	Affiliation
1	?	A. ?	
2	A ILLEGIBLE	W ILLEGIBLE	
3	AARON	PAUL C.	
4	AARONSON	DORIS	
5	AASUM	MARK	
6	ABBOTT	PATRICIA A.	
7	ABBOTT	DOROTHEA C.	
8	ABEL	DIANE CLAIRE	
9	ACCETTA	JACQUELINE	
10	ACOSTA	MORTA	
11	ADAIR	TERESA	
12	ADAMO	CATHERINE R.	
13	ADDISON	DOREEN	
14	ADICKES ?	SANDRA	
15	ADLER	S. DAVID	
16	AEPERT ?	JOAN E.	
17	AFFRUNTI	PAT	
18	AFRICANO	ANTOINETTA	
19	AGOSTE	CARMEN L.	
20	AGTE	BRUCE B.	
21	AHERN	EDITH M.	
22	AHLES	RAY	
23	AHMER	BILL	
24	AIGNER	RUTH	
25	AILEY	ASHER	
26	AISLINE	J.	
27	ALAMA	PAULINE	
28	ALDEN	CHARLES	
29	ALDEN	LUCAS	
30	ALDEN	PAULINE C.	
31	ALDOM	TERENCE	
32	ALEXANDER	NANCY	
33	ALFONE	ANN	
34	ALFONSO	LINDA F.	
35	ALLCOCK	ELIZABETH & DOUG	
36	ALLEN	JULIA	
37	ALLEN	LESLIE	
38	ALLEN	MARY M.	
39	ALLEN	SUSAN J.	
40	ALLEN	TERRI	
41	ALLESSIO	RENEE	
42	ALLISON	NELLY	
43	ALMAGUER	MICHAEL	

44 ALOIA	LINDA S.
45 ALONSOPEREZ	SANDRA
46 Altier	Dave
47 ALTMAN	TRACYE
48 AMAL ?	TERESA
49 AMICO	DIANE
50 ANAGNOS ?	MARLA
51 ANANYMOUS	
52 ANANYMOUS	
53 ANANYMOUS	
54 ANANYMOUS	
55 ANDANNI	MARY G.
56 ANDEODIS ?	CONSTANCE BERNOTT
57 ANDERSON	KATHY
58 ANDERSON	DENNIS
59 ANDERSON	JAMIE
60 ANDES	GRACE
61 ANDRACKI	THERESA
62 ANDREW	JOHN
63 ANDREWS, JR.	HARRY H.
64 ANDRIOLA	EUGENE
66 ANGARONE	NICHOLAS
65 ANGARONE	NICHOLAS
67 ANGELINI	JANICE
68 ANGLIN ?	LOUGENE
69 ANONYMOUS	
70 ANTOLIK	AMY
71 APPEL	GENEVIEVE
72 APPLE	LYNDA
73 APPLEBY	VERNON D.
74 ARCIDIACONO	PAUL/JANICE
75 ARD	FRANK
76 AREDREAN ?	GEORGE C/PHYLLIS
77 ARGAST	MARILYN
78 ARGENTINA	DEBRA
80 ARMSTRONG	VIRGINIA M.
79 ARMSTRONG	GREGG E.
81 ARNOLD	MARY
82 ARONS ?	LEO
83 ARTHARS ?	CAROL
84 ARTHUR	ANNE F.
85 ARUADOR/AMADOZ	SANDY/SANDJ
86 ARVIEW	ILLEGIBLE D.
87 ASEDO ?	MIRIAM
88 ASERO	ROSANNE
89 ASEVEDO ?	TERRI
90 ASHTON	N.L.
91 ASTAR ?	STANLEY
92 ATHANAS	BESSIE
93 ATIEK	VIRGINIA
94 ATTANSEA	GAIL
95 ATTENELLO	DENNIS & HELEN
96 ATWOOD	ELIZABETH H.
97 AUBIN	KATHLEEN
98 AUFDERHAR	MR/MRS. ROBERT
99 AUG	JUDY
100 AUGEU	THOMAS J.

101 AUGUST	SANDRA	
102 AUTRAN	ROLAND	
103 AVILIO	PATRICIA	
104 AWTKS		
105 AXELROD	JUDITH A.	
106 AYERS	LANA	
107 AYRES	LORRAINE B.	
108 AZZOHIVA ?	ANNETTE L.	
109 B ILLEGIBLE	EDWARD W. ?	
110 B ILLEGIBLE	C ILLEGIBLE	
111 BABICKA	JERRY/LYNN	
112 BACICH ?	DONNA	
113 BACKER	HENRIETTA L.	
114 BACON	ALIX	
115 BACON	OGDEN C.	
116 BADENHAUSEN	THOMAS M.	
117 BADER	DOUGLAS & DONNA	
118 BADER	SOPHIE	
119 BAGG	MARK	
120 BAGGALEY	MARGARET	
121 BAHNASIDER ?	JULIO	
122 BAHTO	SHIRLEY	
123 BAILE	TAMARA	
124 BAILIN	KYLIE	
125 BAILIS	MARIA G.	
126 BAIN	ELIZABETH	
127 BAIRD	DOUGLAS	
128 BAJOR	JILL D.	
129 BAKER	ALBERTA M.	
130 BAKER	MARIE	
131 BAKER-PULASKI	PHILIP & BETH A.	
132 BAKOULIS	MARION B.	
133 BAKUN	GEORGE B.	BAYWAY REFINING COMPANY
134 BALABAN	PAULINE	
135 BALAZA	CHARLES A.	
136 BALDWIN	DONNAMARIE	
137 BALL	JOSEPH J.	
138 BALLAL	KANAKA	
139 BALTER	EVA	
140 BANCHERI	MELANIE	
141 BANDOMER	JOANN & KENNETH	
142 BANDSTRA	MIEKE	
143 BANIT	THOMAS	
144 BANKS	PATRICIA	
145 BARAKAT ?	MARY	
146 BARBARO	PHYLLIS	
147 BARBATO	MR/MRS	
148 BAR-DAVID ?	MICHAL	
149 BARG	JAMES	
150 BARI	DIANE	
151 BARK	JOANNE	
152 BARKER	DIANE & BILL	
153 BARLEY	ANTHONY	
154 BARLOW	ALICE	
155 BARNES	MARION	
156 BARNHART	PATRICIA L.	
157 BARON	LOUIS	

158 BARON ?	SAM	
159 BARRETT	CAROLE	
160 BARRETT	NANCY	
161 BARRETT	ROBERT & ELIZABETH	
162 BARRETT	SUSAN M.	
163 BARTHOLOMEW	E. EVERT	
164 BARTO	KENNETH R.	
165 BASEHART	BARBARA	
166 BASSETT	CONSTANCE K.	
167 BATCHILA ?	GRETCHEN	
168 BATEMAN	FRANCIS	
169 BATEMAN	JOSEPH	
170 BATES	BRUCE V.	
171 BATHERMAN	RICHARD E.	
172 BATTAGLIA	FRANK	
173 BATTERSBY	LOIS	
174 BAUER ?	E. RUTH	
175 BAUEREISS	KURT W.	
176 BAUGH	WAYNE	
177 BAUMGART	CHARLES W.	
178 BAXLEY ?	MARTHA W.	
179 BAXTONY	AL	
180 BAY	PETER	
181 BAYER ?	MARY	
182 BAYMOR	JANY	
183 BAYNES	DAN	
184 BAZANY	MARGARET L.	ROHM AND HAAS COMPANY
185 BEACH, JR.	DAVID G.	
186 BEALKOWSKI ?	ELLEN	
187 BEARD	RONALD E.	
188 BEARG	ESTHER M.	
190 BEATINI	M. (MR. & MRS.)	
189 BEATINI	TOM	
191 BEAUREGARD	MR/MRS. RALPH E.	
192 BECK	JOHN C.	
193 BECK	NORMAN R.	
194 BECKER	FRANK	
195 BECKER	MARTIN C.	
196 BEDNAR	MARUEEN/RAYMOND	
197 BEELITZ	MR/MRS. ERIC T.	
198 BEGIUM ?	MARIA & STEPHEN	
199 BEHREND	MARGARET	
200 BEHRENS	RITA	
201 BEHRENS	D.	
202 BEIL ?	ELSIE A.	
203 BEISER ?	KATHY	
204 BELL	CAROLE	
205 BELL	GINGER	
206 BELLINGER	MICHELE	
207 BELOTTI	CATHERINE	
208 BELTRAMI	JOSEPH	
209 BENDEL	BERTHA B.	
210 BENDER	FRED	
211 BENDER	ILLEGIBLE/ILLEGIBLE	
212 BENDLER	BRENDA	
213 BENEDETTE ?	ELIZABETH	
214 BENINGO	DOMINICK	

215 BENK ?	DIANA L.
216 BENNETSEN	WALTER
217 BENNETT	ALEX
218 BENNETT	RICHARD D.
219 BENNETT	BABS
220 BENSON	WILLIAM J.
221 BENTE	JUNE
222 BENZ	CHARLES W.
223 BERARDI	ADAM
224 BERBERIAN	ANNE
225 BERBEROGLU	SIBEL
226 BERG	GLORIA T.
227 BERGER	PATRICIA
228 BERGMANN	DOROTHY
229 BERINGER	ALISON
230 BERMAN	MAUREEN LACOVARA
231 BERMAN	SYLVIA/ROBERT
232 BERMAN-WEIL	ANNE & ED
233 BERNARDO	MARYANNE
234 BERNSTEIN	CHRISTINE
235 BERNSTEIN	SUSAN
236 BERRIEN	JUDITH W.
237 BERROT ?	PETER J.
238 BERSCH	BERTRAND T.
239 BERSON	JANET S.
240 BERTOLOTTI	JOHN
241 BERUSTEIN	AARON
242 BESCH	KATHLEEN
243 BEV	CONITEEN J.
244 BEY	SHEILA/DONALD
245 BIALER	CHARLOTTE
246 BIASE	CATHERINE
247 BIBBRIUS ?	SHIRLEY
248 BIDO	LETICIA
249 BIDWELL	CARIN
250 BIERACH ?	PEGGY C.
251 BIHALY	JUDITH
252 BILL	W.M. (MRS.)
253 BILLIE	NATALIE
254 BILLINGS	ROBERT E.
255 BINDER	MARIA
257 BINENSTOCK	ALAN
256 BINENSTOCK	ALAN
258 BIOLETTI	JEFF
259 BIRKENHAGEN	CHARLES
260 BIRUK	JOHN
261 BISBERG	MERYL
262 BISSET	FREDA F.
263 BITTON	SHARON
264 BIZZIU ?	KATHRYN
265 BLACK	SUZANNE
266 BLACKISTON	ROBERT
267 BLACKMAN	HERMAN & ANNE
268 BLADT	BILL
269 BLAKESLEE	CAROLINE G.
270 BLANCHARD	DANIEL
271 BLANK	MARTIN

272 BLANKENHORN	F. L.	
273 BLANKENLORN ?	CECILE	
274 BLANTHORN	JOAN L.	
275 BLEEKER	KATHLEEN A.	
276 BLESSING	JEAN	
278 BLOCK	AARON	
277 BLOCK	AARON	
279 BLUE	DONNA	
280 BLUM	JUNE	
281 BLUMBERG	ADELE	
282 BLUMENKRANTZ	ELLEN	
283 BLUMENTHAL	BARBARA	
284 BOAF ?	PENNY	
285 BOBB	DOROTHY H.	
286 BOCCHINO	JOEL R.	
287 BOCCIA	DENISE	
288 BOCKOVEW	FLORENCE	
289 BOCTOR	PAULETTE	
290 BODEK	RICHARD & MARIA	
291 BODENSTERN	BOB	
292 BODINE	BRIAN	
293 BODROGI	DAWN M.	
294 BOETTGER	JANET	
295 BOGAN		
296 BOGART	JAMES	
297 BOGEL	BARBARA	
298 BOGERT	ELEANOR	
299 BOGHOSIAN	THOMAS	
300 BOGROFF	JASON	
301 BOHL ?	STEVEN	
302 BOISE	AUDREY L.	
303 BOLAND	CHERYL	
304 BOLLETTIERI	JOSEPH	
305 BOLLETTIERI	VALORIE	
306 BOLTON	DOROTHY	
307 BOLYAI	MELANI	
308 BONETTE	ANDREA	Mayor of East Amwell Township in Hunterdon County Two Bridges Sewerage Authority
309 BONGIOVANNI	ROBERT N.	
310 BONISLAWSKI	VERA	
311 BONNER	PATRICK	
312 BONNER	STEVE	
313 BONURA	JERRY	
314 BOOGOTTA	PHYLLIS	
315 BOONE	SHARON	
316 BORAS	JO & LEONARD	
317 BORCHERS	JENNIFER	
318 BORDEN	THOMAS A.	RUTGERS ENVIRONMENTAL LAW CLINIC
319 BOREL	ARMAND	
320 BORELLI	JANET	
321 BORGEOHOFF	COTHELIA N.	
322 BORGES	FRANK J.	
323 BOROWSKI	WILLIAM	
324 BORSA	LILLIAN	
325 BOSKO	PAULA	
326 BOSS	NANCY M.	

327 BOSS ?	ILLEGIBLE	
328 BOTTI	GEORGETTE J.	
329 BOVENIZER	ALLISON	
330 BOVENIZER	ALLISON	
331 BOWDEN	DIANE	
332 BOWERS	FRED H.	
333 BOWLES-DeBIASA	DONNA	
334 BRADSHAW ?	ILLEGIBLE	
335 BRAGG	BRIAN	
336 BRAMLEY	LINIFRED T.	
337 BRANDEAL	MR/MRS./HAROLD	
338 BRANDON	CARI	
339 BRANDT	LYNN A.	
340 BRAUN	BERTHA H.	
341 BRAUN	JOSEPH A.	
342 BRAUN	STEPHEN Z.	
343 BRAUN	VICTORIA	
344 BRAWER	ANNE	
345 BREDART ?	HELEN	
346 BREDLOW	LOIS	
347 BREEN	JEREMIAH	
348 BRENNAN	LAURY S.	
349 BRESLIN	CECILE	
350 BRESLIN	DANIEL P.	
351 BRESLIN	GAIL K.	
352 BREWER	CHANDLER R.	
353 BREWSTER	MR/MRS. ROBERT S	
354 BRIBER	KATHERINE	
355 BRICK	JAMES W.	
356 BRIER	GERTRUDE	
357 BRIN	DIANA	
358 BRINE	CHARLES	
359 BRINKER	ERICA	
360 BRINKER	SANDRA	
361 BRISTOL	NANCY	
362 BROAD	BILL	
363 BROADBENT	CATHERINE	
364 BRODY	JOYCE	
365 BROEMALL	ROBERT B.	
366 BROMBERG	GERALD	
367 BRONHARD	JENNIFER	
368 BROSEN	ETHEL	
369 BROSKO	EILEEN	
370 BROSKY	STEVEN	
371 BROWN	ALLISON	
372 BROWN	MARGARET	
373 BROWN	LARRELL R.	ALLIANCE FOR A LIVING OCEAN
374 BROWN	C. R.	
375 BROWN	G. ALLAN	
376 BROWN	GIGI W.	
377 BROWN	KEVIN	
378 BROWN	PATRICIA	
379 BROWN	SAMUEL M/M	
380 BROWN	SUSAN	
381 BROWN	TIMOTHY R.	
382 BROWN	WILLIAM	
383 BROWN	MELONIE	

384 BROWN	SANDRA	
385 BROWN	TOM	
386 BROWNSTEIN	MILDRED	
387 BRUNDA	VINCE	
388 BRUNDA	STACIA	
389 BRUNO	NANCY	
390 BRUSCHI	MARIA	
391 BRY	BRENNA H.	
392 BRYAN	EMMA L.	
393 BRYAN	VERNA	
394 BUBET	FRANK	
395 BUCHMELTER	BRENDAN	
396 BUCHTMAN	EEANIE	
397 BUCQUET	CAROLINE	
398 BUDA	BEATRICE ANN	
399 BUEN ?	ROSE	
400 BUERKLE	WALTER A.	
401 BULGER	JUNE	
402 BULLEY	RAYMOND M.	
403 BUMILLER ?	MICHELE	
404 BUNNELL	MRS/MR. JOHN	
405 BUONO	FRANK/ROSINA	
406 BUQUICCHIO	BARBARA	
407 BURANI	SERGIO	
408 BURBACH	RUTH E.	
409 BURGER	KATHRYN A.	
410 BURKE	MICHELLE	
411 BURNE	BRIAN	
412 BURNS	SARA	
413 BURNS	COLETTE M.	
414 BURNS	AUDREY S.	
415 BURNS	DENISE	
416 BURNS	KRISTEN	
417 BURNS	MARILYN	
418 BURROWES	WILLS A.	
419 BURROWS	DOROTHY	
420 BURTON	BARBARA	
421 BUSHNELL	RICHARD	
422 BUTERA	VIRGINIA	
423 BUTLER	BROCK	
424 BUTLERO ?	DENISE	
425 BUTTO ?	ILLEGIBLE	
426 BUTULA	ANNA	
427 BUTZ	RICHARD ?	
428 BYERS	MICHELE S.	NJ CONSERVATION FOUNDATION
429 BYFORD	TRACYLEA	
430 BYINGTON	SUSAN	
431 BYRNE	COLLEEN	
432 BYRNE	DONNA	
433 BYRNE	GERALDINE/GEORGE H.	
434 BYRNE	JANICE B.	
435 BYRON	JUDY	
436 CAAMANO	V.	
437 CABANAS	INA Z.	
438 CAGALL	KATHY	
439 CAHN ?	MATT	
440 CAIN	CHARLENE E.	

441 CAIN	ERNEST E.	
442 CAKIN	MENIK B.	
443 CALABRIA	LAURA	
444 CALDWELL	JANICE M.	
445 CALHON ?	BETTY J.	
446 CALISE	LINDA	
447 CALLAHAN	ELLEN R.	
448 CALLAN	CARMEN L./WILLIAM B.	
449 CALLANAN	LORRAINE	
450 CALLAS	GEROGE/MARILYN/JENNIFER	
451 CALLIARI	CAROLE L.	
452 CALLUS	MEGAN	
453 CAMACHO	FRANCES M.	
454 CAMENDOLA	GREGG	
455 CAMPBELL	TARA	
456 CAMPBELL	JOSEPH P.	
457 CAMPBELL	BYRON A.	
458 CAMPBELL	MONIKA C.	
459 CAMPBELL	PAUL H.	
460 CAMPBELL	W. ROBERT	
461 CAMWELL	DALE	
462 CANARATA ?	JEANNINE	
463 CANNATA-NOWELL	ANITA	
464 CANNITO	NOEL J.	
465 CANNONE	RICHARD	
466 CANTILLI	JOHN	
467 CAPORALE	KAREN	
468 CAPOZUCCA	JOHN	
469 CAPPOLA	ALAN R.	
470 CAPUTO	DONNA Y.	
471 CAPUTO-TESSER	KATHLEEN & JONATHAN	
472 CARAVANO	JOSEPH E.	
473 CARAVELLI	ZELDA A.	
474 CARDONE	JASON	
475 CAREY	JOANNE M.	
476 CARLE	NANCY & JAMES	
477 CARLEN	MARIANNE	
478 CARLETTA	MARY ANNE	
479 CARLEW	RICHARD D.	
480 CARLON ?	JACQUELINE	
481 CARLOUGH	BOB	
482 CARLSON	ERIC & COLLEEN	
483 CARLSON	FRANCES	
484 CARLSON	FAYE	
485 CARLTON	PAULA	
486 CARLUCCIO	TRACY	DELAWARE RIVERKEEPER
487 CARMEN	DANIEL	
488 CARNEVALE	ROBERT & DENISE	
489 CAROLA	GINA	
490 CAROLA	HUGH	
491 CARON	MICHELE	
492 CARONE	EMILY	
493 CARRIGAN	JAMES	
494 CARROLL	JAMES	
495 CARROLL	MICHAEL	
496 CARSON	DHERESA	
497 CARSON	DIANE	

498 CARSON
499 CARTER
500 CARTER ?
501 CARUSO
502 CASALE
503 CASCIO
504 CASE
505 CASISTIE ?
506 CASSANO
507 CASSEBAUM ?
508 CASSELLS
509 CASSON
510 CASTELLI
511 CASTERLINE
512 CASTILLO
513 CAVALERI
514 CAVALUZZO
515 CECERO
516 CERELLI, JR.
517 CERINO
518 CERMELE
519 CETROLA
520 CHALMERS
521 CHAMBERLIN
522 CHAMBERS
523 CHAO
524 CHAPPELL
525 CHAPPE-TINAU ?
526 CHARLTON
527 CHASE
528 CHEESMAN
529 CHELIUS
530 CHEN
531 CHEN
532 CHEN
533 CHEN
534 CHENEL
535 CHENG
536 CHERALIEN
537 CHERRY
538 CHESTER
539 CHEUNG
540 CHEWNING
541 CHIMELESKI
542 CHIORAZZI
543 CHIU
544 CHOE
545 CHOI
546 CHRISTIAN
547 CHRISTIANA
548 CHRISTOFOLLO
549 CICCIA
550 CICEHINO ?
551 CIDOW ?
552 CIFRODELLA
553 CIFUENTES
554 CIPMANN ?

MARY ELLEN
KIMM
LUICILLE
MARTHA
JUDITH M.
TRACY
BARBARA
CONSTANCE
ANTHONY & LESLIE
MARIE T.
ALBERTA
EVERETT H.
JANA
JOAN
RITA
TIMOTHY
EDITH
MILDRED
WILLIAM
MARIE T.
JO & JOHN
MARIA
BARBARA
GLEN
BEVERLY
SZU-WEI
MARVIN P.
SEAN & C ?
JOHN J.
DIANNE D.
RAY
EDWARD & ELAINE
YUE
ILLEGIBLE W.
LUCINDA
SAU-HA NIKKI
FRANCESCA
SHIRLEY
BESSIE N.
GARY
PAUL & ROSEANNE
CHI KWAN
LAURA
DANIELLE
LORRAINE
TIMMY
CHANE
EUNSEOK
MARY JO
JAMES F. & JUDITH
C.
DURRELL
NELLO
ELAINE
JOSEPHINE
FRANCHESCA
GIME ?

555 CLAEYS	VIRGINIA M.	
556 CLARK	LYNN	
557 CLARK	LEE	
558 CLARK	MICHAEL	
559 CLARK	SUSAN	
560 CLARKE	GERTRUDE	
561 CLARK-KUDLESS	DIANNE	TONWHSIP OF TEWKSBURY
562 CLAUDALL	CHARLIE	
563 CLEARY	EDWARD & MILLICENT	
564 CLEAVER	JACQUELINE	
565 CLEEFF	HENRY	
566 CLEMENT ?	SANTHA	
567 CLERK	PANSY K.	
568 CLEVERLEY	WILLIAM	
569 CLOCK ?	CHRISTY	
570 CLOVER	GARY & PATRICIA	
571 CLUNIE	JEFFREY D.	
572 COCHRANE	ROBERT/ESTHER	
573 COCHRANE	BARBARA	
574 COCOVINIS	DEREK	
575 COE ?	BARBARA W.	
576 COFFEY	ROBERT	
577 COHEN	ILENE	
578 COHEN	JOSEPH & BARBARA	
579 COHEN	JUDITH	
580 COHEN	MARTIN	
581 COIRO	DIANE	
582 COLA	SUSAN N.	
583 COLANERO ?	JAMES L.	
584 COLBERT	JODY	
585 COLBY	RICHARD	
586 COLEMAN	DIANA	
587 COLGAN	DEBORAH	
588 COLLAN	DORIS	
589 COLLINS	JANE	
590 COLLINS	ED	
591 COLLINS	ELIOT W.	
592 COLLINS	GARY	
593 COLLINS	JANE D.	
594 COLNA	ROBIN	
595 COLODNER	LINDA	
596 COLOMA ?	JEANNETTE	
597 COLOSIMO	BETH	
598 CONDINI	MARILYN/NEREO	
599 CONGE	ERRIA	
600 CONKLIN	ANNA	
601 CONLIN	MARTHA P.	
602 CONNELL	SHERIE & J. J.	
603 CONNOLLY	ANNE	
604 CONNOLLY	BILL	
605 CONNOLLY	NORA	
606 CONNOR	ALICE O.	
607 CONNOR	JESSE & JOHN J.	
608 CONNORS-DeLUCA	H. M.	
609 CONOVER	CHARLES W.	
610 CONRAD	MARK	
611 CONSIDINE	JOHN	

612 CONTE	NANCY	
613 COOK	ANNE	
614 COOK	ALEXIS G.	
615 COOK	ANGELA	
616 COOK	EMILY G.	
617 COOK	JUSTINE	
618 COOK	MARISA	
619 COOK	STANLEY L.	
620 COOK	EDMUND	
621 COOK	ELIZABETH A.	
622 COOK	SAM	
623 COOK	MARISA	
624 COOPER	CHARLES	
625 COOPER	NEIL	
626 COPLEY	ROBBIE	
627 CORBIN	JAMES H.	
628 CORCODILOS	NICK	
629 CORCORAN	MICHELLE	
630 CORCORAN	ROBERT E.	
631 COREMIN ?	DOLORES	
632 CORNER	DAVID D.	
633 CORNOG	ELWOOD	
634a COSGROVE	JAMES F.	TRC OMNI ENVIRONMENTAL
634b COSGROVE	JAMES	On Behalf of the Town of Clinton
634c COSGROVE	JAMES	On Behalf of Pulte Homes
634d COSGROVE	JAMES	On Behalf of Mount Holly SA
634e COSGROVE	JAMES	On Behalf of Somerset Raritan SA
635 COSINO ?	CHRIS & SUE ?	
636 COSSABOON	JOYCE E.	
637 COSTA	ELEANOR	WOMAN'S CLUB OF CARLSTADT
638 COSTANTINO	CAMILLE	
639 COSTELLO	CHARLES	
640 COSTON	MARGARET H.	
641 COUH ?	SAU ?	
642 COURY	JAMES	
643 COVELLO	ART	
644 COVIELLO	LEONARD	
645 COVINGTON	KATHARINE	
646 CRAIN	NAN GOPTILL	
647 CRALEY	AUSTIN & GAIL	
648 CRAM	VIRGINIA	
649 CRASSNOKER ?	KATHY	
650 CRAWFORD	JANET	
651 CRESPI	LOIS	
652 CRIMMINS	JUDITH A.	
653 CROPPER	ILLEGIBLE	
654 CROSS	MARY JANE	
655 CROSSEY	ROBERT	
656 CROWE	HAROLD	
657 CROWLEY	MARCIA	
658 CROWLEY	PATRICK	
659 CRUM	DANIEL	
660 CRUZ	VICTOR	
661 CSURKE	JULIANNA	
662 CULLEN	SHANNON	
663 CULLEN	TERESA M.	
664 CUMMINGS	BRENDA	

665 CUNHA	GINA	
666 CUNNEY	MARY BETH	
667 CUOZZO	PATRICK	
668 CURNYN	NORDH ?	
669 CURTIN	ANNA	
670 CURTIS	B.	
671 CURTIS	LAUREN	
672 CURTIS	BARBARA	
674 CUTRI-FRENCH	MARY	
675 CUTRI-FRENCH	MARY	
673 CUTRI-FRENCH	MARY	
676 CYWINSKI	RAYMOND	UNITED WATER
677 CZAR ?	NANCY Y.	
678 D' AFFONSECA ?	JANIS ?	
679 DAEPPER	THOMAS	
680 DAEHNKE	DAVID	
681 DAHL	STEVEN	K. HOVNANIAN CO.
682 DALCOURT	G.J.	
683 DALES	KATHY	
684 DALESANDRIS	MARIE	
685 D'ALESSANDRO	CARMELA	
686 DALESSIO	CINDY A.	
687 DALEY	JAD	Appalachian Mountain Club
688 DALLAM	BETH	
689 DALLING	MARYANN	
690 DALO	RALPH	
691 DALY	MRS. M.B.	
692 DAMBRA	JOHN	
693 DAMRON	ELIZABETH A.	
694 DANIELS	JANE ?	
695 DANIELS	STEPHANIE	
696 DANUE	LORETTA	
697 D'APRILE	MIKE	
698 DARIE	DIANE L.	
699 DARNTON	ROBERT/SUSAN	
700 DAVIDSON	JIM	
701 DAVIDSON	THEODORE	
702 DAVIS	MELFORD	
703 DAVIS	DIANE L.	
704 DAVIS	JAMES/SALLIE	
705 DAVIS	JANE	
706 DAVIS	PATRICK & URSULA	
707 Davis	Christopher	
708 DAVOL	SARAH R	
709 DAY	MARY CAROL	
710 DAY	MR/MRS. CHARLES S.	
711 DAY	THEODORE & SUSAN	
712 DAZZO	SUSAN	
713 DE LA MOTTE	JANE/CHARLES	
714 DE LA TORRE	ANDREA	
715 DE LEO	DONALD W.	
716 DE MASI	C. MILDRED	
717 DE WITT	BONNIE	
718 DEARMIN	VIRGINIA C.	
719 DEAS	MAE M.	
720 DeCICCO	CAROL	
721 DeFALCO	CHEYENNE	

722 DeFALCO
 723 DeFAZIO
 724 DEGANGE
 725 DEL DUCA
 726 DeLITTA
 727 DELL
 728 DELL
 729 DELLEY
 730 DeLORENZO
 731 DEMAREE
 732 DeMARIA
 733 DEMERS
 734 DEMPSKI
 735 DEMPSTY
 736 DeNICHILLO
 737 DENNIS
 738 DENSBERGER
 739 DENTZ
 740 DENZER
 741 DEO
 742 DERDERIAN
 743 DeREA
 744 DERSTINE
 745 DeSANTIS
 746 DeSMEDT
 747 DESPLAT
 748 DETMOLD
 749 DEUTSCH/LEUKET ?
 750 DEVICH ?
 751 DEVILLERS
 752 DEVLIN
 753 DeVOE
 754 DEW ?
 755 DEWITT
 756 DI FABBI
 757 DI FRANCISCO
 758 DI GIULIO
 759 DI SANTO
 760 DIAZ
 761 DICENZO ?
 762 DICKER
 763 DiCORCIA
 764 DiCORCIA
 765 DIEHL
 766 DIEHL
 767 DIETRICH
 768 DIETTE
 769 DiGEIVE ?
 770 DiLALLO
 771 Dillingham
 772 DILTS
 773 DiMAURO
 774 DiMICELLI
 775 DINESCLI
 776 DIONISIO
 777 DiPASQUALE
 778 DiPRIMA ?

LINDA
 KIM
 CHUCK/MICHELE
 MARILYN
 MARJORIE
 MAE A.
 MARK E.
 CASANDREN
 DORIS M.
 ELIZABETH D.
 DONNA
 MICHAEL
 REV.STELLA/SOPHIE
 LAURA & KEVIN
 JOANN
 TIM
 RICHARD
 JON-ERIC
 JOAN
 JAYNE S.
 SUSAN
 PHILIP
 MARY
 GENE
 SANDRA
 ANN-MARIE
 P.
 CAROL/TOM
 EDWARD
 BLAKE S.
 MELANIE A.
 THOMAS E. M/M
 COLLEEN
 CHRISTINE
 FRANCES
 NICHOLAS
 JAMES
 FANNY
 DAN
 DONALD S.
 GINGER
 RICHARD B.
 M/M
 JEFFREY/JOANN
 KENNETH T.
 CLIFFORD B
 FREDERIC
 MARK
 JO
 Tim
 RANDY
 JENNIFER
 JOSEPHINE
 CARMEN
 JACK J.
 HANK
 FRANCINE M.

American Littoral Society

779 DISCENZA	REGINA/FRANK	
780 DISQUE	ANDREW	
781 DiSTEFANO	ANGELA	
782 DITKO	FLORENCE	
783 DITTMAR	CAROLYN	
784 DiVIOLO ?	MICHAEL A.	
785 DIX	WILLIAM	
786 DIXON	KEVIN L.	NEW JERSEY-AMERICAN WATER CO
787 DIXON	LEAH	
788 DOAN	MARY LOU	
789 DOBROWOLSKI	R.T.	
790 DOERR	BARBARA	
791 DOHECTY	DONNA	
792 DOHERTY	KATHYRN L.	
793 DOHMAN	HELEN A.	
794 DOHREMEND ?	MICHAEL	
795 DOLAN	ERIN	
796 DOLCIMASCOLO	S. T.	
797 DOLE	LINDA	
798 DOMIDION	VINCENT	MONMOUTH CO WATER RESOURCES ASSOCIATION
799 DOMINGUEZ	JANE	
800 DOMINIONE	VALERIE	
801 DOMINO	ILLEGIBLE	
802 DON	DAVE	
803 DONAT	DARLENE	
804 DONLON	DORIS	
805 DONOHUE	ADRIENNE R.	
806 DOODY	MARY B.	
807 DORFMAN	KAREN	
808 DOUST/WEISS	RICHARD/DIETMAR	
809 DOWER	JO ANN	
810 DOWNING	HILARY	
811 DOWNING	HILARY	
812 DOYLE	KATHLEEN	
813 DOYLE	ANTJE	
814 DREHEIL	JANET	
815 DRESDNER, ESQ.	KAHERINE V.	
816 DRESSEL	WILLIAM G.	LEGISLATIVE VIEWPOINT
817 DRESSER	FRANK	
818 DREYLING	CHRIS	
819 DRISCOLL	PAUL	
821 DRISCOLL-KELLY	JOAN	
822 DRISCOLL-KELLY	JOAN	
820 DRISCOLL-KELLY	JOAN	
823 DROST	COURTNEY	
824 DROST	DANIELLE	
825 DRUCKER	ADRIENNE	
826 DUBIN ?	ROBERT A.	
827 DUBINMASTER ?	DR. VICTORIA	
828 DUCKWORTH	JENNIFER	
829 DUDLEY	CURTIS & ANNETTE	
830 DUERR	COLLEEN P.	
831 DUERWALD	CAROL	
832 DUFFY	MARY ANN	
833 DUGAN	GLYNN	

834 DUGAN	KIRK	
835 DUGAN	LISA M.	
836 DULIN ?	J.MICHAEL/KATHLEEN	
837 DULISSE	ANTHONY	
838 DUMAIS	SUSAN J.	
839 DUNAY	IRMA	
840 DUNCAN	LANNA MOORE	
841 DUNHAM	GAIL	
842 DUNHAM	MARJORIE P.	
843 DUNIETZ	IRWIN S.	
844 DUNN	KATHLEEN G.	
845 DUNNE	LORETTA	
846 DUNSHEE	STEPHANIE	
847 DUPONT	MARY A.	
848 DURANT-EDMONDS	NANCY A.	
849 DURHAM	TRUDY	
851 DURLACHER	BROOKE	
850 DURLACHER	BROOKE	
852 DUTHIE	HELEN	
853 DUYM ?	DANIELLE	
854 DWYER	GAIL	
855 DYJAK ?	ANNE	
856 DYKES	EVELYN RUTH	
857 DZIELAK	MICHAEL J.	
858 EASTMAN-GALLO	DANNY	
859 EASTON	KATHY	
860 EBENSPERGER	ELIZABETH C.	
861 EDDY	GAYLE E.	
862 EDELBERG	ROBERT	
863 EDELMANN	CAROLYN FOOTE	
864 EDEN	JOSEPHINE S.	
865 EDMAN	MABEL ?	
866 EFROS	MAGDALENA	
867 EFSTATHIOU	ATHON	
868 EGAN	HELEN	
869 EGBERT	WILLIAM & GISELE	
870 EGENTON	MICHAEL	NJ STATE CHAMBER OF COMMERCE
871 EGGOLT	ANNETTE	
872 EGLLHOFF	CHARLES	
873 EHRENBECK	ROBERT	
874 EHRENREICH	DALE (MRS.)	
875 EICHMAN	MEG	
876 EIDMANN-HICKS	RUSSELL	
877 EIKNER	AUDRE	
878 EISDORFER	STEPHEN	HILL WALLACK
879 EISENBEG	IRIS	
880 EISENFELD	NINA	
881 EITEL	JAMES	
882 EKSTROM	LINCOLN	
883 ELAND	PAUL D.	
884 ELDER	AMY	
885 ELDREDGE	FRANCIS S.	
886 ELIAS	H.	
887 ELIASSEN	DEBBIE	
888 ELLIOTT	ANNA	
889 ELLIOTT	JEAN G.	

890 ELLIS	WILLIAM C.	
891 ELLRICH	COURTNEY	
892 ELMAN	MARK	
893 ELMENDORF	ELEANOR T.	
894 ELMI	ERICA	
895 ELSE	I. LOUISE	
896 ELUZURIAGA	MARIA	
897 EMBER	STEVE	
898 EMERITO	MARGARET	
899 EMERSON	OLGA	
900 EMMONS	MARYLENE	
901 EMR	THOMAS	
902 ENARD	MARY	
903 ENGEL	ADRIENNE	
904 ENGER	ELAINE	
905 ENGLANDER	DONALD L. & ENINIGLON ?	
906 ENGLISH	CAROLYN B.	
907 ENGLISH	LILLIAN S.	
908 ENGSBERG	RICHARD C.	
909 ENKER	JOAN	
910 ENNIS	DONNA J.	
911 ENOLO	JANE	
912 ENRIQUEZ	DANIELLE	
913 EPHRAIM	SUSAN	
914 EPPENSTEINER	DOROTHY	
915 EPSTEIN	BETTE M.	
916 EPSTEIN	PATRICIA/DAVID	
917 ERICKSON	MARYBETH & TOM	
918 ERICKSON	JANET	
919 ERLER	RICHARD T.	
920 ERNIDIS	HELEN K.	
921 ERNST	RHUA	
922 ERNST ?	ROSEMARIE	
923 ERWOOD	R.	
924 ESCH	PATRICIA	
925 ESPINOSA	EDUARDO & MARIA	
926 ESTELLE	DOUGLAS L.	
927 EVANS	JANICE	
928 EVES	JUDY	
929 EWEN	R.	
930 EWING	ANDREW S.	
931 EWISO ?	GAIL/JAMES	
932 EWS ?	TANYA	
933 EXTER	PHYLLIS	
934 FABIAN	DEBORAH	
935 FACKLER	RICHARD	COLORITE SPECIALITY RESINS
936 FACQ ?	JOHN/GRETCHEN	
937 FADEA	RITA	
938 FAIGLE ?	JEFFREY F.	
939 FAIRMAN, JR	MR/MRS H.K.	
940 FALCONER	ELIZABETH	
941 FALDUTO	MARYANN	
942 FALICK	H.	
943 FALLON	LAWRENCE	
944 FARABAUGH	SUSAN	
945 FARBER	GINNY & PAUL	
946 FARDY	STEVEN S.	

947 FARERI	JULIE/FRANK	
948 FARIMA	ROBERT	
949 FARINAS	MANUEL	
950 FARLAND	JEAN M.	
951 FARLOW	NANCY	
952 FARM	DONALD & URSULA	
953 FARNHAM	J & ANN R.	
954 FARNHAM	KOLLEEN	
955 FARRELL	KATHLEEN	
956 FASANO	JEAN	
957 FAUGNO	LOUISE	
958 FAULKNER	GREGORY C.	
959 FAWCETT	ANN S.	
960 FAX	VICKI	
961 FAY	DEBORAH E.	
962 FAY	MIKE	
963 FAZEKAS	LINDA	
964 FAZZARI	GEORGETTE	
965 FEIER	STUART/CLAUDETTE	
966 FEINSTEIN	JEROME M.	
967 FEKETE	CYNTHIA	
968 FELDMAN	REGINA	
969 FELDMAN	DAVID/MARILYN	
970 FELLER	ELIZABETH	
971 FENNELL-HALLIDY	MICHAEL D. & LINDA M.	
972 FEOLE	ALBERT M.	
973 FERGUSON	DAWN DeCOOK	
974 FERNANDEZ	ILLEGIBLE	
975 FERRAINOLO	ROSEMARIE	
976 FERRARO	ANNA	
977 FERRARO	MARY ELLEN	
978 FIAKELSTEIN ?	JUNE	
979 FIDACARO	DIANE	
980 FIEDLER	BARBARA	
981 FIEHERA	DANIELLE	
982 FIELDS	CLETUS	
983 FIERRO	HANK	
984 FILERA	DENISE	
985 FILIPPONE	ELLA F.	PASSAIC RIVER COALITION
986 FILIPPONE	ADELE	
987 FILLER	CHERYL	TOWNSHIP OF READINGTON
988 FILUS	WAYNE	
989 FINALE	BRIAN L.	
990 FINCK	JANICE	
991 FINE	STEPHEN L.	
992 FINEMAN	MARILYN	
993 FINGER	ROBERT L.	
994 FINK	CHARLOTTE	
995 Fink	Larry	New Jersey Conservation Foundation
996 FINKEL	MARK & CHAVA	
997 FINKRAL	KEITH C.	
998 FISCHER	JENNIE L.	
999 FISCHER	JACKIE	
1000 FISHER	MARY	
1002 FITZGERALD	JOHN	
1001 FITZGERALD	FRAN	
1003 FITZPATRICK	JUDY	

1004 FITZSIMMONS	MARY D.	
1005 FITZSIMMONS	MARY ANNE	
1006 FLACH	ANNA	
1007 FLANAGAN	CAROL	
1008 FLECKENSTER ?	SHARON L.	
1009 FLEISCHER	BARBARA	
1010 FLINN	PATRICIA	
1011 FLOOD	JOAN	
1012 FLORENCE	DOUG & SANDY	
1014 FLORES-TOBER	LINDA	
1015 FLORES-TOBER	LINDA	
1013 FLORES-TOBER	LINDA	
1016 FLORN ?	DANIEL	
1017 FLOWER	HENRY & VIVIAN	
1018 FLOYSTAD	THORLEIF H.	
1019 FLYNN	DAWN	
1020 FOARD	MARY LOGAN	
1021 FOLEY	DANIELLE	
1022 FOLEY	KELSEY	
1023 FOLEY	THOMAS	
1024 FOLEY	ZACHARY	
1025 FOL-OKAMOTO	MERCEDES	
1026 FONLAW-HOFF	LINDA	
1027 FORBES	JOHN	
1028 FORD	CAROL	
1029 FORD	PETER	
1030 FORNESS	LINDSAY L.	
1031 FORREST	LYNN	
1032 FORSHAY	EDWARD J.	
1033 FOSTER	EARNEST F.	
1034 FOTI	THOMAS & SALLY	
1035 FOTINIS	PANAGIOTIS & VASILIKI	
1036 FOTTOLA	DENA	New Jersey PIRG
1037 FOWLER	BONNIE	
1038 FOX	JANE	
1039 FOX	EUGENE	
1040 FOX	TOM	
1041 FRANCE	BRITTANY S. & JEFF	
1042 FRANCESE	MICHAEL B., JOANNE GILBERT	
1043 FRANCIS	KAKTHLEEN	
1044 FRANEKE	RUTH	
1045 FRANK	WILLIAM	
1046 FRANKE	DOUGLAS C.	
1047 FRANKLIN	H. BRUCE	
1048 FRASER	DAVID J.	
1049 FRASERS		
1050 FRATZ	JUDITH FAYE	
1051 FRAY	ILLEGIBLE	
1052 FREED	ELAINE	
1053 FREEMAN	ROBERT M.	
1054 FREEMAN	TERRY	
1055 FREENY	ANNE	
1056 FREIMAN	ALVIN H. & NADINE R.	
1057 FREITAG	BOB	
1058 FREY	HOLLY	
1059 Frey	Wilma - testified on behalf of all these	The Highlands CoalitionThe Highlands Coalition

companies

The Appalachian Mountain Club
 ANJEC
 The Hunterdon Coalition
 The Mountain Preservation Society
 The Musconetcong Watershed
 Association
 New Jersey Conservation Foundation
 New Jersey Environmental Federation
 New York-New Jersey Trail Conference
 Passaic River Coalition
 Pequannock Watershed Coalition
 Sierra Club
 Trout Unlimited
 Vernon Civic Association
 Friends of Holland Mountain
 Friends of the Sparta Mountains
 The Upper Rockaway Watershed
 Association
 Phillipsburg Riverview Organization

1060 FRIANT
 1061 FRICK
 1062 FRIEDMAN
 1063 FRIEDMAN
 1064 FRIEDMAN
 1065 FRIEDMAN
 1066 FRIEL
 1067 FRINO
 1068 FRITZ ?
 1069 FROELICH
 1070 FROSTICK
 1071 FRUMEFREDDO
 1072 FRY
 1073 FRYCKI
 1074 FTERA
 1075 FU
 1076 FUCCI
 1077 FUKUYOSHI
 1078 FULLAM
 1079 FULLER
 1080 FULLERTON
 1081 FURNARI
 1082 FURNARI

LAWRENCE F.
 GREGORY
 ALISSA
 BARBARA
 JEAN L.
 TEARL
 ANDREA
 ROSE T.
 STEVEN ?
 KARL C.
 GEORGIANA I.
 JENNIFER
 GRETCHEN
 STEPHEN
 CONSTANCE
 YUN & LENNIE
 JUDY
 SUSUMU
 DEE
 ROBERT
 CARL
 RUSSELL J.
 RUSSELL J.

PSE&G
 WATERSHED MANAGEMENT
 AREA 5

1083 FUSCO
 1084 G. ILLEGIBLE
 1085 G. ILLEGIBLE
 1086 GACEK
 1087 GADEA
 1088 GAELICK
 1089 GAGER
 1090 GAGLIANONE
 1091 GALANTE
 1092 GALBORNETTI
 1093 GALE
 1094 GALETTO
 1095 GALLAGHER
 1096 GALLAGHER

LINDA
 STEVE
 AGNUS
 AMELIA
 RAMON & LOUISE
 ELIZABETH
 MARY S.
 RICHARD
 MICHAEL/STACY
 LILLIAN
 JOHN E.
 JANE MORTON
 PATRICIA
 GEORGIANA

1097 GALLAGHER	ISABEL P.	
1098 GALLAGHER	PATTIE	
1099 GALLIGAN	KATHY	
1100 GALLIPEAU ?	JOANN	
1101 GALLO	MARTHA CARLUCCI	
1102 GALLOWAY	ELIZABETH H.	
1103 GALLOWAY	MARK C.	
1104 GALLUCCI	CYNTHIA	
1105 GAMACHE	PATRICIA A.	
1106 GAMES	GEORGE	
1107 GAN	WALTER C.	
1108 GAND ?	RITA	
1109 GANNIERSI ?	E.	
1110 GANNON	PATRICIA	
1111 GANZ	DAVID L.	BOROUGH OF FAIR LAWN
1112 GARBER	JULIE	
1113 GARCES	MAUREEN SIVIER ?	
1114 GARCIA	SAMUEL ?	
1115 GARCIA	ANA ISEZ	
1116 GARMANY	WILLIAM J.	
1117 GARNER	DENISE	
1118 GAROFALO	ANNETTE & ROBERT	
1119 GARRETT	CURT W. & JULIA M.	
1120 GARRIGANA	PAT A.	
1121 GARRIS	JOAN	
1122 GARRO	D.	
1123 GARRY	LORRAINE GAGLIARDOTTO	
1124 GATELY	PATRICIA	
1125 GATES	GREGG P.	
1126 GATTI	FRANK	MAYOR, READINGTON TOWNSHIP
1127 GATTI	FRANK	
1128 GAZON	A.	
1129 GAZON	RICHARD	
1130 GAZON	SUETLONA ?	
1131 GEARMAN	JANET	
1132 GEIGER	CAROLYN	
1133 GEIGER	PETER	
1134 GEISSLER	DIANE/CHRIS	
1135 GELFOND	JENSEN	
1136 GELGER ?	EV	
1137 GELINNE	DEIDRE	
1138 GENDRAU ?	JOYCE	
1139 GENTILE	GARY	
1140 GENUTE	EMLY	
1141 GERARD	CORNELIUS F.	
1142 GERDING	PAT	
1143 GERNETT	MARK	
1144 GEROGE	CHARLES F.	
1145 GERTLER	CINDY	
1146 GERUDORF	CLIFFORD P.	
1147 GERWATOSKI	LINDA	
1148 GHERALDI	JEAN	
1149 GHIRALDI	RONALD	
1150 GIBBS	ELIZABETH	
1151 GIBSON	HELEN M.	
1152 GIFFORD	DIANE	
1153 GIFOL	SHARON	

1154 GIGANTE	LORETTA
1155 GIGON	S. (MRS)
1156 GILBERT	CYNTHIA
1157 GILDE	NAOME/MICHAEL
1158 GILES	JOAN
1159 GILL	GREGORY J.
1160 GILL	CHARLES J.
1161 GILLEN	JENNIFER
1162 GILLEN	JOYCE A.
1163 GILLESPIE	FRED
1164 GILLESPIE	TRISTAN
1165 GILLIGAN	JANE
1166 GILPIN	DONALD
1167 GILRIS	JOHN M.
1168 GIORDANO	LOUIS
1169 GIROUX	CAROL & JIM
1170 GIULIANO	JOSEPH
1171 GIUNCO	JOHN A.
1172 GLADFELTER	N. N.
1173 GLANTZ ?	MARCY
1174 GLASER	MARTHA
1175 GLASER ?	ROBERTA ?
1176 GLASS	LORI
1177 GLASSCOCK	ELLEN
1178 GLASSNER	SHIRLEY
1179 GLENN	MRS/MR. RONALD
1180 GLEURROCK	JIM GARRIGON
1181 GLIOZZI	CORINNE
1182 GLOSSBRENNER	KENNETH C.
1183 GNEIDING	LAURIE
1184 GODLEY	WILLIAM L.
1185 GOEHRING	DOROTHY
1186 GOERLER	ELLEN
1187 GOFFEN	R ?
1188 GOLD	RUTH L.
1189 GOLDBERG	MERRIL
1190 GOLDBERG	LAUREN
1191 GOLDBERG	BRENDA
1192 GOLDBERG	CARYRE ?
1193 GOLDBERG	RICHARD A.
1194 GOLDBERG	ELLEN
1195 GOLDMAN	ALAN
1196 GOLDSCHMIDT	B. R.
1197 GOLDSHOLL	LARRY
1198 Goldsmith	Amy
1199 GOLDWORTH	SAMUEL
1200 GOLKIN	KEN
1201 Golon	Frank
1202 GOMEZ	BOZENA
1203 GOMEZ	MR/MRS MARTHA
1204 GOMEZ	ANNE
1205 GONNELLA	MARY
1206 GONZALES	NANCY
1207 GONZALEY ?	DEBORAH
1208 GONZALEZ	SARAY
1209 GOODFELLO	MARY
1210 GOODMAN	BARBARA J.

New Jersey Environmental Federation

1211 GOODMAN	SIDNEY	
1212 GOODY	HELEN	
1213 GORDAN	FRANCES	
1214 GORDON	LINDA C.	
1215 GORDON	MICHAEL	
1216 GORDON	PAMELA	
1217 GORGA	JOSEPH E.	
1218 GORMALEY	BRENDA & MATTHEW	
1219 GORMAN	PETER	
1220 GORMAN	SHAWN	
1221 GOSIN	STEVEN (M/M)	
1222 GOSS ?	BERNARD	
1223 GOTTLIEB	ALFRED	
1224 GOUGH	DONNA	
1225 GOUVOUNIOTIS	JOHN	
1226 GRAFF	LORETTA/CHRIS	
1227 GRAHAM	ALICIA D.	
1228 GRAHAM	KATHY S.	
1229 GRAHAM	KAREN	
1230 GRAIVGN ?	JAN	
1231 GRANDELA	NEIMA	
1232 GRASSI	LAURA	
1233 GRATTO	CATLIN	
1234 GRAVER	ROBERT	
1235 GRAY	MARGARET T.	
1236 GRAY	DORIS E.	
1237 GRAY	ILLEGIBLE	
1238 GRBETT	PATRICIA	
1239 GREBERIS	STAN	
1240 GREEN	JOANNE OSTER	
1243 GREENBERG	ELIZABETH	
1241 GREENBERG	LAWRENCE	
1242 GREENBERG	ADOLPH	
1244 GREENE	ELLIN	
1245 GREENE	AMY S.	ENVIRONMENTAL CONSULTANTS, INC.
1246 GREENWALD	ELEANOR	
1247 GRETZ?	GLADYS GRACE/CHRISTINA ELIZA	
1248 GRIFFIN	ELIZABETH M.	
1249 GRIFFIN	DOUGLAS K.	
1250 GRIFFIN	LANET L.	
1251 GRIFFIN	ALEX	
1252 GRIFFITH	DORIS	
1253 GRIMALDI	PHILIP J.	
1254 GRINDLINGER	SANDY & IRA	
1255 GRIPPO ?	DOROTHEA	
1256 GRISWOLD	JUDITH A.	
1257 GROESSBARK ?	KATHLEEN	
1258 GROFF	F.W. & SUSAN	
1259 GROFFIE	HELEN	
1260 GROGAN	JANICE	
1261 GROMACK	DAVID	TOWNSHIP OF CLINTON
1262 GRONWALD	ROBERT	
1263 GROSS	WILLIAM	
1264 GROSS	MICHAEL	
1265 GROSSMITH	JUDITH A.	
1266 GROZECKI ?	KATHLEEN	

1267 GRUBE ?	THERESA	
1270 GRUBER	DEBORAH	
1268 GRUBER	DEBORAH	
1269 GRUBER	JOSEPH	
1271 GRUEBEL	JOAN	
1272 GRUNERT	V.	
1273 GRYNBERG	HELENE	
1274 GUARIGLIA ?	SUZANNE	
1275 GUBITOSA	FRANCES	
1276 Gudmundsson	Agust	Trout Unlimited
1277 GUEAR	GARY L.	NJ GENERAL ASSEMBLY
1278 GUERIN	ADELINE	
1279 GUERIN	DONALD	
1280 GUERRS	ILLEGIBLE	
1281 GUEST	ELIZABETH	
1282 GUIDA	JAMES M.	TOWNSHIP OF LYNDHURST
1283 GUIDA	CARMELINA	
1284 GULBINSKY	ELLEN	ASSOCIATION OF ENVIRONMENTAL AUTHORITIES
1285 GULDEN	JEANNIE	
1286 GULLFORD	MYLES	
1287 Gutowski	Ronald	Franklin Township Planning Board
1288 GUZLAS	SUE	
1289 GUZZARDO	ANDREA	
1290 H ILLEGIBLE	THELMA	
1291 HACHEY	GREGORY	
1292 HACHEY	GREGORY	
1293 HADFIELD	JOANNE	
1294 HAGAN	FRANCIS B.	
1295 HAGER	GAIL	
1297 HAGERTY	FRANCES M.	
1296 HAGERTY	BRIAN	SHARK RIVER CLEANUP COALISION
1298 HAGGARD	JEANNE	
1299 HAGMAIER	ROBERT	
1300 HAGON	CATHERINE	
1301 HAGUE ?	ROBERT & JEAN	
1302 HAILEY	LISA	
1303 HAINES	JOEL	
1304 HALAJIAH	JOSEPH	
1305 HALASEK	ALICE MARGARET	
1306 HALL	CERALD	
1307 HALL	DENNIS	
1308 HALL	KRISTIN	
1309 HALLECK	MARGARET E.	
1310 HALLORAN	ROBERT B.	
1311 HALOFSKY	SANDRA	
1312 HALPIN	MARY C.	
1313 HALPIN	CHRIS	
1314 HALPIN	JOHN T.	
1315 HALPIN	THOMAS P.	
1316 HAMANN	KENNETH	
1317 HAMER	JAMES	
1318 Hamilton	Leonard	Great Swamp Watershed Management Committee
1319 HAMMELL	STEPHANIE	
1320 HAMMER	LYNN	

1321 HAMMOND
1322 HANCOCKS
1323 HAND
1324 HANK
1325 HANNA
1326 HANSEN, III
1327 HANSSON
1328 HAPPEL
1329 HARDEN
1330 HARDING
1331 HARELICK
1332 HARKEY
1333 HARLAN
1334 HARLEY
1335 HARMOVITZ
1336 HARPER
1337 HARRINGTON
1338 HARRINGTON
1339 HARRIS
1340 HARRIS
1341 HARRISON
1342 HARRISON
1343 HARRISON
1344 HARRITY
1345 HARTEN
1346 HARTFORD
1347 HARTMAIER
1348 HARTMAN
1349 HARTMAN
1350 HARVEY
1351 HARWELL
1352 HARWOOD
1353 HASSA
1354 HATCH
1355 HATTON
1356 HAUPTMAN
1357 HAVENS
1358 HAVENS
1359 HAVENS
1360 HAYES
1361 HAYES
1362 HAYES
1363 HAYKO
1364 HAYNES
1365 HEALY
1366 HEATTER
1367 HECK
1368 HEDIGER
1369 HEELD
1370 HEGARTY

1371 Hegarty
1372 HEINEMANN
1373 HEISLER
1374 HELCK ?
1375 HELD
1376 HELENEK

PAUL
PATRICIA
WILLIAM
NANCY
STEVE
HARRY A.
DENISE
WILLIAM R.
FLORENCE
VINCE & FAMILY
BEATRICE
MARIA
ERIC
ROBERT
ANDREA
KATHY
BARBARA
CURTIS & LINDA
MATTHEW
ROGER
GEORGE W.
MARTHA
WILLIAM T.
NANCY
DAVID L.
LORETTA P.
CAROL
CONNIE & BRUCE
MICHAEL J.
ELEANOR
CAROL A.
TOBY
LINDA M.
DOROTHY L.
FRANK
FELICE
KATHLEEN G.
GIFFORD
MATT
FAMILY
TODD R.
WILLIAM D.
GLORIA
ROB
JAMIE
JOHN
SEYMOUR C.
DONALD
ILLEGIBLE
BRIAN

Brian
MARGARET
NANCY
ALEXANDRIA R.
RICH
ANGELA

TOWNSHIP OF UNION

SHARK RIVER CLEANUP
COALITION INC.
Shark River Clean Up Coalition

1377 HELF	SAMUEL/LILLIAN	
1378 HELLER	DAVID	
1379 HELLERMAN	GEORGE	
1380 HELLMICH	ROLF	
1381 HENDERSON	JOHN L.	
1382 HENDERSON	ARNOLD	
1383 HENDRICKS	ROSE ANN	
1384 HENDRICKSON	FRANK	
1385 HENEL	DORA K.	
1386 HENNESSY	ROY	
1387 HENRY	FREDERICK J.	
1388 HENSLER	TUCKER	
1389 HERDMAN	CLAIRE	
1390 HERELD	GABY	
1391 HERMAN	NANCY	
1392 HERMARCK	CLAIRE	
1393 HERRMANN	RONALD	
1394 HERSH	TAMMY	
1395 HETZEL	NANCY L.	
1396 HEULITT	WAYNE	
1397 HEY	XIAR ?	
1398 HICKEY	RITA	
1399 HICKOX	BARBARA	
1400 HIGGINBOTHAM	PAM	
1401a HIGGINS	ANDREW J.	APPLIED WATER MANAGEMENT, INC. – South Branch Rockaway Applied Wastewater Management Inc. – Sidney Brook
1401b HIGGINS	ANDREW J.	
1402 HILBIG	DIANA	
1403 HILDEBRANDT	KATHLEEN	
1404 HILL	STEPHANIC	
1405 HILL	CARLA E.	
1406 HILL	HENRY	PULTE HOMES
1407 HILLIARD	PATRICIA	
1408 HINGSTON	JAN	
1409 HINMAN	ELIZABETH	
1410 HINWICKY	AL	
1411 HIRNE	SUSAN B.	
1412 HIRSHOREN	HARRIET L.	
1413 HJELM	CARLA E.	UNITED WATER
1414 HO	EDWARD K.	ROCKAWAY VALLEY REGIONAL S. A.
1415 HOBSON	LAURIE K.	
1416 HODGE	ROBERT J.	
1417 HODGES	LILLIAN	
1418 HODGETTS	PATRICIA	
1419 HOERNER	PATRICIA	
1420 HOERNLEIN	CAROL	
1421 HOFFMAN	FRED	
1422 HOFFMAN	GILBERT	
1423 HOFFMAN	MONIQUE/GILBERT	
1424 HOLBERT	ANN	
1425 HOLDEN	HAROLD MR/MRS	
1426 HOLENKO	ALEX A.	
1427 HOLEREF ?	PATRICIA	
1428 HOLLAND	W. M/M	
1429 HOLLENBERG-	WALTER & DIANA	

LAMBRECHT

1430 HOLMAN
1431 HOLMES
1432 HOLMGREN
1433 HOLT
1434 HOLT
1435 HOLT
1436 HOMYAK
1437 HOOD
1438 HOOGLAND
1439 HOOPER
1440 HORE ?
1441 HORNBACK

1442 HORNUNG ?
1443 HORSMAN
1444 HORVATH
1445 HOWARD
1446 HOWARD
1447 HOWE
1448 HOY
1449 HOYNS
1450 HRUNKA
1451 HUANG
1452 HUBER
1453 HUBNER
1454 HUDACSKO
1455 HUDSON, JR.
1456 HUEBNER
1457 HUGHES
1458 HUGHES
1459 HULL
1460 HULME
1461 HULSART ?
1462 HUNT
1463 HUNT
1464 HUNT
1465 HUNT
1466 HUNT/LEE
1467 HUNTER
1468 HURLEY
1469 HUTCHINSON
1470 HUTTON
1471 HYDE
1472 HYLEN
1473 HYNOSKI
1474 HZNEK
1475 IACALUCCI
1476 IANNELLI
1477 IANNITTO
1478 IDE
1479 ILLEGIBLE
1480 ILLEGIBLE
1481 ILLEGIBLE
1482 ILLEGIBLE
1483 ILLEGIBLE
1484 ILLEGIBLE

THOMAS SPENCER
BARBARA N.
EDYTH L.
CHARLES W.
LAURITZ M/M
ROBERT E.
NICHOLAS
KIM
DOROTHEA
EDWARD/MAIRAN
R.
CHRISTOPHER

Association of Metropolitan Sewerage
Agencies (AMSA)

EDWARD
DAVID
LORRAINE
SUSAN & JONATHAN
GEORGE
KATHY/JIM
RICHARD
LOIS
DIANA
ALICE
JANE E.
EVAN
DENNIS W.
HARRY A.
PETER
SAM
JoANN
PAMELA
ROBERT D.
MADELINE
THOMAS M.
BEN
ELLIOT
JENNIFER
HOLLAND/RICHARD
JANET
MARLENE
MALCOLM
RITA/ROBERT
GEORGE & KAY
MARGIE & LYLE
CATHLEEN A.
WALTER
PHILIP/JOSEPHINE
ANGELA
MARY ANN
TIMOTHY
ILLEGIBLE
ELIZABETH
FOCELLO ?
GEORGE
ILLEGIBLE
M.

1485 ILLEGIBLE	OLGA
1486 ILLEGIBLE	S. ?
1487 ILLEGIBLE	SEAN
1488 ILLEGIBLE	ILLEGIBLE
1489 ILLEGIBLE	ILLEGIBLE
1490 ILLEGIBLE	L. A.
1491 ILLEGIBLE	LOUISE
1492 ILLEGIBLE	NANCY JANE
1493 ILLEGIBLE	ANN
1494 ILLEGIBLE	ANTHONY L.
1495 ILLEGIBLE	CHARLES
1496 ILLEGIBLE	ILLEGIBLE
1497 ILLEGIBLE	ILLEGIBLE
1498 ILLEGIBLE	ILLEGIBLE
1499 ILLEGIBLE	LAURIE S.
1500 ILLEGIBLE	LIME ?
1501 ILLEGIBLE	S.M.
1502 ILLEGIBLE	SCOTT
1503 ILLEGIBLE	SHIRLEY
1504 ILLEGIBLE	ASHETON ?
1505 ILLEGIBLE	B.
1506 ILLEGIBLE	DARIF ?
1507 ILLEGIBLE	EVANS T.
1508 ILLEGIBLE	HANS
1509 ILLEGIBLE	ILLEGIBLE
1510 ILLEGIBLE	ILLEGIBLE
1511 ILLEGIBLE	ILLEGIBLE
1512 ILLEGIBLE	ILLEGIBLE
1513 ILLEGIBLE	ILLEGIBLE
1514 ILLEGIBLE	ILLEGIBLE
1515 ILLEGIBLE	ILLEGIBLE
1516 ILLEGIBLE	ILLEGIBLE
1517 ILLEGIBLE	ILLEGIBLE
1518 ILLEGIBLE	ILLEGIBLE
1519 ILLEGIBLE	J.
1520 ILLEGIBLE	J.
1521 ILLEGIBLE	J.
1522 ILLEGIBLE	JAMES
1523 ILLEGIBLE	KEVIN ?
1524 ILLEGIBLE	LAURIE ?
1525 ILLEGIBLE	LIANNI ?
1526 ILLEGIBLE	PAUL
1527 ILLEGIBLE	ROSE
1528 ILLEGIBLE	ILLEGIBLE
1529 ILLEGIBLE	ILLEGIBLE
1530 ILLEGIBLE	A.
1531 ILLEGIBLE	CHARLES
1532 ILLEGIBLE	ED
1533 ILLEGIBLE	ELENE
1534 ILLEGIBLE	GARY
1535 ILLEGIBLE	ILLEGIBLE
1536 ILLEGIBLE	ILLEGIBLE
1537 ILLEGIBLE	ILLEGIBLE
1538 ILLEGIBLE	ILLEGIBLE
1539 ILLEGIBLE	ILLEGIBLE
1540 ILLEGIBLE	ILLEGIBLE
1541 ILLEGIBLE	ILLEGIBLE

1542 ILLEGIBLE	ILLEGIBLE
1543 ILLEGIBLE	ILLEGIBLE
1544 ILLEGIBLE	ILLEGIBLE
1545 ILLEGIBLE	ILLEGIBLE
1546 ILLEGIBLE	ILLEGIBLE
1547 ILLEGIBLE	JANE
1548 ILLEGIBLE	JANE A.
1549 ILLEGIBLE	JOHN
1550 ILLEGIBLE	JOHN
1551 ILLEGIBLE	JOHN
1552 ILLEGIBLE	JULIET
1553 ILLEGIBLE	L.
1554 ILLEGIBLE	M.
1555 ILLEGIBLE	PEDEO
1556 ILLEGIBLE	ROBERT
1557 ILLEGIBLE	THERESA
1558 ILLEGIBLE	A. L.
1559 ILLEGIBLE	B.
1560 ILLEGIBLE	BARRY S.
1561 ILLEGIBLE	BART ?
1562 ILLEGIBLE	BEALE
1563 ILLEGIBLE	BEVERLY
1564 ILLEGIBLE	BONNIE L.
1565 ILLEGIBLE	CAROL B.
1566 ILLEGIBLE	CATHY
1567 ILLEGIBLE	CHARLES
1568 ILLEGIBLE	CHRIS M
1569 ILLEGIBLE	CLARENCE E.
1570 ILLEGIBLE	CLAUDIA
1571 ILLEGIBLE	DEBORAH
1572 ILLEGIBLE	DEBRA
1573 ILLEGIBLE	DOUGLAS
1574 ILLEGIBLE	DOUGLAS
1575 ILLEGIBLE	E. P.
1576 ILLEGIBLE	EDGAN
1577 ILLEGIBLE	ELAINE
1578 ILLEGIBLE	ELISE
1579 ILLEGIBLE	F. W.
1580 ILLEGIBLE	GARL
1581 ILLEGIBLE	GARY
1582 ILLEGIBLE	GLADYS
1583 ILLEGIBLE	ILLEGIBLE
1584 ILLEGIBLE	ILLEGIBLE
1585 ILLEGIBLE	ILLEGIBLE
1586 ILLEGIBLE	ILLEGIBLE
1587 ILLEGIBLE	ILLEGIBLE
1588 ILLEGIBLE	ILLEGIBLE
1589 ILLEGIBLE	ILLEGIBLE
1590 ILLEGIBLE	ILLEGIBLE
1591 ILLEGIBLE	ILLEGIBLE
1592 ILLEGIBLE	ILLEGIBLE
1593 ILLEGIBLE	ILLEGIBLE
1594 ILLEGIBLE	ILLEGIBLE T.
1595 ILLEGIBLE	JAMES J.
1596 ILLEGIBLE	JIM
1597 ILLEGIBLE	JOHN
1598 ILLEGIBLE	JOSEPHINE

1599 ILLEGIBLE	JULIA	
1600 ILLEGIBLE	KAREN	
1601 ILLEGIBLE	KAREN BARKER	
1602 ILLEGIBLE	KATHY	
1603 ILLEGIBLE	KATHY	
1604 ILLEGIBLE	L. ?	
1605 ILLEGIBLE	LESLIE W.	
1606 ILLEGIBLE	LILIAS M.	
1607 ILLEGIBLE	LINDA	
1608 ILLEGIBLE	LINDA S.	
1609 ILLEGIBLE	LORETTA	
1610 ILLEGIBLE	LUIS/ELIZABETH	
1611 ILLEGIBLE	MARGARET ?	
1612 ILLEGIBLE	MARGARET R.	
1613 ILLEGIBLE	MARK S.	
1614 ILLEGIBLE	MARK/DEBBIE	
1615 ILLEGIBLE	MICHAEL	
1616 ILLEGIBLE	MICHAEL	
1617 ILLEGIBLE	MILDRED	
1618 ILLEGIBLE	MILDRED C.	
1619 ILLEGIBLE	NANCY	
1620 ILLEGIBLE	NANCY K.	
1621 ILLEGIBLE	NASSERI	
1622 ILLEGIBLE	PATRICIA D.	
1623 ILLEGIBLE	PATRICIA M	
1624 ILLEGIBLE	PATRICIA N.	
1625 ILLEGIBLE	PAUL & CARMELA ?	
1626 ILLEGIBLE	RH. J.	
1627 ILLEGIBLE	ROSE	
1628 ILLEGIBLE	S ILLEGIBLE	
1629 ILLEGIBLE	SAUL	
1630 ILLEGIBLE	VERNON ?	
1631 ILLEGIBLE	VERONICA/OUELLETTE	
1632 ILLEGIBLE	W.C.	
1633 ILLEGIBLE	WALTER T. ?	
1634 ILLEGIBLE	WILLIAM	
1635 ILLEGIBLE	WILLIAM R.	
1636 ILLEGIBLE	KENT	
1637 ILLEGIBLE	C.	
1638 ILLEGIBLE	FRITZ	
1639 ILLEGIBLE	GEORGE P.	
1640 ILLEGIBLE	J.	
1641 ILLEGIBLE	MARGARITA ?	
1642 ILLEGIBLE	T.	
1643 ILLEGIBLE/IRIZARRY	MONICA/BRUNO	
1644 ILLEGLIBLE	ILLEGIBLE	
1645 ILLELGIBLE	THEODORE	
1646 INGENITO ?	HARRY S.	
1647 INGLIS	ROBERT	
1648 INGRAM	WINIFRED W.	
1649 INVERSO	PETER A.	NEW JERSEY SENATE
1650 IOVINO	EDWARD G.	
1651 IOVINO	DIANA L.	
1652 IOVINO	VINCENT E.	
1653 IRIZARRY	GLADYS M.	
1654 IRIZARRY	BELINDA	
1655 IRWEN ?	BARBARA R.	

1656 ISAAC	RICHARD	
1657 ISHIKAWA	HELENE	
1658 IVOLDI ?	HAZEL	
1659 J. ILLEGIBLE	J.	
1660 JABIONOWSKI	EVE E.	
1661 JABLONSKI	CYNTHIA	
1662 JACEWICZ	NONA	
1663 JACKSON	JOSEPH	
1664 JACOBSON	GILLIAN G.	
1665 JACUS	ANNA	
1666 JAEGER	BRIAN	
1667 JAMET	ROBERT & PEGGY	
1668 JAMIESON	ELLEN	
1669 JAMIESON	JODI	
1670 JAMIOLKOWSKI	ELIZABETH	
1671 JANET/GEORGE	STERN/THEODORIDIS	
1672 JANIS	ROBERT F.	
1673 JANOVIC	ELIZABETH	
1674 JANOWASKI	CANAL	
1675 JAQUENTO ?	FRANCINE ?	
1676 JARISSEN	ROBERT B.	
1677 JARRELL ?	MARY LOUISE	
1678 JASON	THOMAS	
1679 JAVNA ?	CLAIRE	
1680 JAWORSKI	BILL	
1681 JEANS	SUSAN	
1682 JEFFERY	MARY LOU	
1683 JEFFS ?	JOHN	
1684 JEGLIKOWSKI	JOAN	
1685 JELCICH	SUSAN	
1686 JELLINEK	PAUL/SUSAN	
1687 JENKINS	EDGAR	
1688 JENKINS, JR.	JAMES P.	
1689 JENKINSON	ROBERT	
1690 JENSEN	SUSAN	
1691 Jermansen	Cari	Clean Ocean Action
1692 JESSAP ?	FRANK/JEAN	
1693 JOASCIO	DEBRA M.	
1694 JOCKIL	ELIZABETH	
1695 JOHANSON	KENNETH	
1696 JOHANSON	WYNN	
1697 JOHLORSKI ?	ILLEGIBLE	
1713 JOHNSON	NICOLE	
1714 JOHNSON	NICOLE	
1698 JOHNSON	NICOLE	
1699 JOHNSON	DIANE	
1700 JOHNSON	ELLA MAE	
1701 JOHNSON	JIMMY	
1702 JOHNSON	NANCY M.	
1703 JOHNSON	ELLEN	
1704 JOHNSON	CLARENCE	
1705 JOHNSON	DOUGLAS C.	
1706 JOHNSON	GARRY M.	
1707 JOHNSON	IRENE	
1708 JOHNSON	PAUL	
1709 JOHNSON	RICHARD D.	
1710 JOHNSON	ROLAND W.	

1711 JOHNSON	DON	
1712 JOHNSON	KENNETH	
1715 JOHNSTON	BARBARA	
1716 JOHNSTON	ROBIN	
1717 JOHNSTONE	H.	
1718 JONAS	ROBERT J.	
1719 JONES	GARY J.	
1720 JONES	BARBARA	
1721 JONES	FRANCIS	
1722 JONES	JOYCE J.	
1723 JONES	K.R.	
1724 JONES	NANCY J.	
1726 Jones	Lora	
1725 JONES	DIANE	
1727 JUDD	MARTIN	
1728 JUETTNER	DONNA	
1729 JULIAN	DEBORAH M.	
1730 JULLERAT	BERTRAND	
1731 JURA	MARGO	
1732 JURKOIC	JUDY	
1733 K ILLEGIBLE	CHARLES A.	
1734 KAARI	ERIC A.	
1735 KACEDON	DANA	
1736 KADIN	MORRIS B.	
1737 KAEMPFFEN	KATHERINE	
1738 KAHLER	ERIC	
1739 KAHN	MITCH	
1740 KAISER	MARY ANN	
1741 KAISMORSKI	KRISTYBO	
1742 KAKAN	SHAESTA	
1743 KAKSH ?	ED ?	
1744 KALGNA	DAN	
1745 KALISS	EDWARD T.	
1746 KAMAL	SALMA	
1747 KAMISAROFF	MR. & MRS.	
1748 KANE	KHRISTYN	
1749 KANTOR	SIDNEY	
1750 KAPHN	ROSEMARIE	
1751 KAPLAN	PATRICIA V.	
1752 KAPLAN	DIANE	
1753 KAPLAN	SANFORD & EVA	
1754 KARANFILIAN	MARIE	
1755 KARDUX	JENNIFER	
1756 KARNS	SEYMOUR/JOELL	
1757 KARP	LESLIE	
1758 KARTELL	CONNIE	
1759 KASCHAK	SHANNON	
1760 KASELOW	FREDERICK	
1761 KASHIWABARE	T.	
1762 KASTNING	BILL	
1763 KATES	JACQUELINE B.	TOWNSHIP OF TEANECK
1764 KATONA	LESLIE E.	
1765 KATZ	PAUL	
1766 Kaufman	Roberta	Holmdel Environmental Commission
1767 KAUPAS ?	S.	
1768 KAUST ?	MICHELLE	
1769 KAUTZMAN	DANIEL/DOROTHY D.	

1770 KAVANAUGH	MELANIE & KEVIN	
1771 KAWAHARA	KARL D.	
1772 KAY	JANET M.	
1773 KAY	DEBRA	
1774 KAY	MICHAEL	
1775 KAYAJN	FEJZULLA	
1776 KAYE	EMMA	
1777 KEADY	JAMES W.	EDUCATING FOR JUSTICE
1778 KEARSLEY	DANIELLE	
1779 KEATING	CAROL	
1780 KEEZER	THERESA	
1781 KELIMEN	KATHLEEN	
1782 KELLER	MARY BETH	
1783 KELLEY	KRISTOFFER	
1784 KELLEY	LAURIE	
1785 KELLEY	MATTHEW	
1786 KELLEY	PAUL	
1787 KELLEY	THOMAS	
1788 KELLEY	DONALD & CHRIS	
1789 KELLEY	MICHELE L.	
1790 KELLEY	APRIL	
1801 KELLY	CHRIS	
1791 KELLY	TOM	
1792 KELLY	MARIE E.	
1793 KELLY	MRS.	
1794 KELLY	RICHARD	
1795 KELLY	ANN	
1796 KELLY	HAZEL A.	
1797 KELLY	KATHLEEN	
1798 KELLY	LYNN E.	
1799 KELLY	JIM	
1800 KELLY	MARILYN	
1802 KELTY	SARITA	
1803 KEMLY	ELISABETH	
1805 KENEMAN	AMY LYNN	
1806 KENEMAN	AMY LYNN	
1804 KENEMAN	AMY LYNN	
1807 KENNEDY	HELEN KAY	
1808 KENT	EDITH W.	
1809 KERN	JAY A.	
1810 KERN	MR/MRS. WERNER	
1811 KERN	CHARLES	
1812 KERR	CHARLES D.	
1813 KERRIGAN	TONI	
1814 KERUL-LEEMAN	KERUL & DAVID	
1815 KESSLER	WALPURGA	
1816 KEVIN	BETTY	
1817 KEY ?	GLORIA S.	
1818 KHANLIAN	JOHN	
1819 KHAROD	UMESH J.	
1820 KIEKA	JANET/STEVE	
1822 KIERNAN	TONYA	
1823 KIERNAN	TONY	
1821 KIERNAN	TONYA	
1824 KILLE	CHARLOTTE	
1825 KIM	SOOH	
1826 KINCAID	IAN	

1827 KING	ANN C.
1828 KING	THOMAS F.
1829 KING	ELEANOR
1830 KING	AUSTIN G.
1831 KING	KRISTY
1832 KINNE	KEITHA
1833 KIRSCHENBAUM	BONNIE
1834 KIRSTEN	KENNETH
1835 KISELA	MARCIA
1836 KITAN	KRISTINA
1837 KITSON	JOHN J.
1838 KLACIK	KEN
1841 KLEIN	ADAM
1839 KLEIN	HANNA
1840 KLEIN	JACQUELINE
1842 KLEM	ELIZABETH A.
1843 KLETT	JOSEPH R.
1844 KLIE	DANIEL
1845 KLINE	DANNY
1846 KLIZAS	JONATHAN
1847 KNAEPEN	JUNE B.
1848 KNEIB	RONALD T.
1849 KNEIPP	ELSIE
1850 KNIGHT	MICHELE E.
1851 KNITEL	BARBARA A.
1852 KNOTA	PATRICIA
1853 KNOWLTON	STEPHEN
1854 KOBYLARZ	ANNE
1855 KODJAK	JOHN
1856 KOENIG	GAIL
1857 KOHLER	JOSEPH D.
1858 KOHN	CAROLYN N.
1859 KOLANO	JAMES
1860 KOLANO	LAURIE
1861 KOLOSKI	PATRICIA D.
1862 KOLVITES	KATHLEEN
1863 KOMUKES	LOUIS J. & FRANCA
1864 KONDAS	JEFF
1865 KOPICKI	ALLISON
1866 KORALJA	JASON
1867 KORECKY	LORRE
1868 KORN	AUGUST & CATHERINE
1869 KORNBLUTH	ANDREA
1870 KORNREICH	ANGELA
1871 KORNREICH	CHRISTOPHER
1872 KORNREICH	MARK
1873 KORNREICH	MATTHEW
1874 KORTJOHN	PATRICIA
1875 KOSBERG	EDWARD
1876 KOSCH	DEANDRA
1877 KOSEK	GLORIA
1878 KOSHINSKIE	ROBERT
1879 KOSIEH ?	GENE S.
1880 KOSSON	AUBREY
1881 KOSTELNIK	DIANE
1882 KOSTER	TERRY
1883 KOSTYK ?	ELEANOR

1884 KOUTOUZAKIS	CHRIS	
1885 KOUYIALIS	INGRID	
1886 KOVACS	STEPHEN	
1887 KOVAL	LAURA	
1888 KOVALCIK	ANDREW	
1889 KOWALEWSKI	CANDICE A.	
1890 KOYSSALIN ?	MARIA	
1891 KOZEK	HENRY T.	
1892 KOZY	JASMIN	
1893 KPASENBROCK		
1894 KRAFT	VERNA	
1895 KRAINER	AMELIA	
1896 KRAJCOVIC	GRACE	
1897 KRAKOWIAK	NICOLE	
1898 KRAMER	EDNA M.	
1899 KRAMER	MARLENE	
1900 KRAUSE	NANCY	
1901 KRAWRZYK	GREG/SUSAN	
1902 KREMPA	CAROL	
1903 KRESSEN	MARIE/WILLIAM C.	
1904 KREWINSKI	DONALD & JOYCE	
1905 KREZEL	SOPHIE & TED	
1906 KRIPINSKI ?	MARGARET	
1907 KRISANDA	M.	
1908 KRISTOFF	GLORIA	
1909 KRIZ	DOROTHY	
1910 KRON	BARRY/DELLA ANN	
1911 KRONENBERGER	EMILY	
1912 Kropp	Rick	USGS
1913 KROTOFF	OLEG	
1914 KRUEGER	SR. JEAN MARIE	
1915 KRUMICH	SANDY	
1916 KRUPKA	CHRIS	
1917 KSIEZNIAK	JERZY W.	
1918 KUATHOUREV	DVOTLY	
1919 KURAS	CHRISTOPHER	
1920 KURINZI	MARIE	
1921 KUROWSKI	JENNIFER C.	
1922 KURTZ	CAROL A.	
1923 KURZAWA ?	C.	
1924 KUSHNER	HELEN	
1925 KUSHNER	LAURA	
1926 KUZNIER	JANYS	
1927 LA POINTE	E.	
1928 LABAUGH	DIANE	
1929 LABES	WILLIAM	
1930 LAESEL ?	JOANN	
1931 LAFEURE	LAWRENCE	
1932 LaFON	CAROL	
1933 LAGOS	JOHN M.	
1934 LAGOS ?	LINDA	
1935 LaGRECA	HELEN	
1936 LAHM	FRANK	
1937 LAIN	DIANE	
1938 LAMARCHE	VIRGINIA	
1939 LAMASTRO	PAULA & LOUIS	
1940 LAMBRO	DIANE	

1941 LANCE	LEONARD	NEW JERSEY SENATE
1942 LAND	ROBERT	
1943 LANDVOCKI	ROSE-MARIE	
1944 LANEIESAR	LILA	
1945 LANG	BARBARA T.	
1946 LANG	FRANK	
1947 LANGILL	SHARON	
1948 LANGONE	MARY/VINCE	
1949 LANSET	STEVE	
1950 LANSON	RITA J.	
1951 LANZA	LISA A.	
1952 LANZILOTTI	JOANN	
1953 LAPIDUS	ROBERT	
1954 LAPPE	SARAH	
1955 LARESCH	THOMAS	
1956 LARGRY	CHRIS	
1957 LARKIN	E.	
1958 LAROCIO ?	JEANNETTE	
1959 LARSEN	KAREN	
1960 LaRUSSO	KAREN	
1961 LASTELLA	ANTHONY	
1962 LaStella	Nino	
1963 LAUBACH	STEVE	
1964 LAUE	PETER	
1965 LAURIE	ROY	
1966 LAUSELL	SUSAN	
1967 LAVECKA ?	EDNA	
1969 LAVINE	ANN	
1968 LAVINE	ANN	
1970 LAWAICH ?	STEPHEN	
1971 LAWLER	ELLEN	
1972 LAWLOR	KATHLEEN & ROGER	
1973 LAWRENCE	CHRISTINE	
1974 LAWRENCE	STEPHEN	
1975 LAWRENCE-GILL	BETH	
1976 LAWS	MIKI	
1977 LAWSON	SANDRA	WANAQUE REACH
1978 LAWSON	SANDRA E.	
1979 LAZUR	DORIS A.	
1980 LEACH	ROSEMARY O.	
1981 LEAHY	J.	
1982 LEAVITT	HORACE M.	
1983 LEAVY	JOHN	
1984 LECHTANSKI	CHERYL	
1985 LEDGER	PATRICIA	
1986 LEE	ROBERT E.	
1987 LEE	CHARLOTTE	
1988 LEE	HUDSON	
1989 LEE	SCHWINNE	
1990 LEEDS	DR. MORTON	
1991 LEESON	LEWIS J.	
1992 LEEUWENBURG	HELGE W.	
1993 LEGO	SHEILA	
1994 LEGRANDE	JOHN A.	
1995 LEHMAN	ALEXANDRA S.	
1996 LEHMAN ?	HELEN B.	
1997 LEHMANN	ROBERT	

1998 LEHMKUKL	JOANN
1999 LEITER ?	JULIE
2000 LEMOS	LINDA
2001 LENETT	BARBARA B.
2002 LEONARD	SHARON
2003 LEONARD	CHARLES E.
2004 LEONARD	EDGAR L.
2005 LEONARDIS	HEATHER
2006 LEONE	ANGELIQUE/LORRAINE/RICHARD
2007 LEOPOLD	ROBERT
2008 LEPORE	ROSE
2009 LESPERANCE	MR/MRS LEROY
2010 LESTER	LENILA
2011 LEVIDOW	MR./MRS. B
2012 LEVIN	CAROL
2013 LEVINE	CLAIRE
2014 LEVINE	JOSEPH
2015 LEVINE	LISA
2016 LEVINE	JOYCE
2017 LEVITT	ANDREW B.
2018 LEVY	MADELYN
2019 LEWANDOWSKI	IRENE
2020 LEWANDOWSKI	LOUISE
2021 LEWICKI	SUSAN
2022 LEWIS	ALBERT
2023 LEWIS	HERBERT
2024 LEWIS	ILLEGIBLE
2025 LEWIS	ROBERT/CARLA LEE
2026 LEWIS	ROCHELLE
2027 LEWIS	LEE
2028 LICHTEN	LEONA
2029 LICKI	OLGA
2030 LIEBER	ABE
2031 LIEBMAN	JEFFREY
2032 LIFSHEY	JOAN
2033 LIMONE ?	ANDREW & ELLEN
2034 LIMTRENELO ?	ELECTRA
2035 LIN ?	CHUN
2036 LINCOLN	MARY C.
2037 LINTHICUM	ESTELLA M.
2038 LINTON	BILL
2039 LIPINSKI	M.
2040 LIPP	THEA
2041 LIPSITZ	PAULETTE
2042 LIPSKY	FRANCES D.
2043 LIPTON, Jr.	JOHN
2044 LISOTTO-LILLIS	DOMENICA
2045 LITTLE	AMANDA
2046 LITTLE	GEORGE
2047 LITTLE	JOSHUA
2048 LITWIN	MIKE
2049 LITWIN	RALPH
2050 LIVELLI	TISHA
2051 LOBO	MARIA
2052 LOBUONO	JOANNE M.
2053 LoCASCIO	RALPH
2054 LOGAN	CORDUVA

2055 LOIACONO	JOAN
2056 LOKKER ?	THAIS
2057 LOMBARDE	ADRIENNE/JOE
2058 LOMBARDI	BARBARA
2059 LOMBARDO	LAURA
2060 LOMBARDO	ROBERT J.
2061 LOMBARDO	GLORIA
2062 LOMBURDE ?	CAROL
2063 LONG	ELAINE
2064 LONGSTREET	DOROTHY
2065 LOOZEN	JOSEPH H. F.
2066 LOPEZ	CHERYL
2067 LOPUH	JOYCE
2068 LORCHEIM	PAUL
2069 LORD	HERBERT
2070 LORENZO	SUSAN/KENNY
2071 LORIA	HEIDI
2072 LOSGAR	VINCENT P.
2073 LOSPALUTO	MILDRED
2074 LOUGHLIN	DIANE
2075 LOVE	JACQUELINE
2076 LOVE	ANDREW
2077 LOVETH ?	JOSEPH
2078 LOVICH-GIL ?	PATRICIA
2079 LOW	RUTH & ERNEST
2080 LOWELL ?	MR/MRS LEONARD G.
2081 LOWRY	WILLIAM H.
2082 LOZADA	BIANCA
2083 LUBETKIN	REBECCA L.
2084 LUBKE	MILDRED
2085 LUCAS	PAUL A.
2086 LUCATORTO	ANTHONY
2087 LUCKING	JOHN R.
2088 LUCKSEME	JOHN S.
2089 LUDEMANN	CATHIE
2090 LUDWIGSON	KATHLEEN
2091 LUKA	KRIS
2092 LUNDBERG	IAN
2093 LUNDY	JOELLEN
2094 LUNIEWICZ	BARBARA O.
2095 LUNNEY	K. ?
2096 LUPERI	ALMA/MARIO
2097 LUPPERIO ?	D.
2098 LUSK	JOHN & EMILY
2099 LUTNER	KATHRYN
2100 LUTTER	ROBERT & URSULA
2101 LYNCH	LAURA
2102 LYONS	JOHN
2103 LYONS	TERRY
2104 M ILLEGIBLE	BARBARA ?
2105 MA	JESSICA
2106 MAACK	FRAN C.
2107 MABEY	REUDELL
2108 MAC CARTHY	PAUL
2109 MAC FADYEN	ARTHUR
2110 MAC RAE	PEGGY H.
2111 MACBO ?	V.

2112 MACCARONI	CHERYL A.	
2113 MACCHIAVELLO	MARILYN	
2114 MacDOWELL	KAREN	
2115 MacFARLANE	MARGARET	
2116 MacHAFFIE	EILEEN	
2117 MACHT	JENNIFER	
2118 MACIASRJEK	HELEN	
2119 MACK	E.	
2120 MACKEVIN	LEE & ALEX	
2121 MACLESLA ?	CHESTER	
2122 MADDEN	WILLIAM & MARGARET	
2123 MADDOCK	HELEN M.	
2124 MAGARELLI	ANTHONY & ELLEN	
2125 MAGASICH	PHIL	
2126 MAGGIO	DONNA	
2127 MAGLIACANE	MARJORIE	
2128 MAGNOTT	FRANK	
2129 MAHER	RAYMOND	
2130 MAHLBACHER	ROBERT A.	
2132 MAHNKE	MARK	
2133 MAHNKE	MARK	
2131 MAHNKE	MARK	
2134 MAHON	PATRICK	
2135 MAHONEY	JANICE J.	
2136 MAHONEY	ELENA & THOMAS	
2137 MAHONEY	KATHY/DENNIS	
2138 MAINE	BRIAN	
2139 MAJOR	ED	
2140 MAJOR	WILLIAM & PATRICIA	
2141 MAKER (?)	JUDY S.	
2142 MAKKAY	TED	
2143 MAKOFKA	LINDA	
2144 MALANGA	SALLY	
2145 MALEOH ?	DOYLE	
2146 MALEY-QUATTRONE	MONICA D.	
2147 MALLAMACE	MARIA	
2148 MALLOY	JOYCE	
2149 MALMGREEN	ABIGAIL	
2150 MALMSTEDT	MARYANN	
2151 MALOK	ANDRE	
2152 MANDELSHON	PAUL	
2153 MANENTE	FRANK (MR. & MRS.)	
2154 MANFINO ?	JERRY	
2155 MANFRO	KEVIN	
2156 MANGAN	LORI	
2157 MANGERI	KEVIN J.	
2158 MANGINO	JEAN E.	
2159 MANION	JILL A.	S.P.A.R.E. JACKSON
2160 MANION	ELAINE	
2161 MANKOWSKI	GRACE	
2162 MANKOWSKI	NANCY	
2163 MANN	L.R.	
2164 MANN	HILDA M.	
2165 MANN	JOEL	
2166 MANNIGN	ALEXA	
2167 MANSIER	LAURENCE A.	
2168 MANUR ?	RACHEL	

2169 MARESCA	SUZANNE	
2170 MARINA	SHARON	
2171 MARINELLI	MICHAEL	
2172 MARINO	STEPHEN E.	
2173 MARINO	SHARON	
2174 MARION	LAURA	
2175 MARK	PETER M.	
2176 MARKENDORF	MARY	
2177 MARKLE	JANET L.	
2178 MARKOWITZ	GERMAINE	
2179 MARKOWSKI	CATHERINE	
2180 MARKS	ALAN M.	
2181 MARLIN	DAN	
2182 MARLIN	MERCEDES L.	
2183 MARLOW	MARGARET	
2184 MARRA ?	ED	
2185 MARRON	CLAIRE	
2186 MARSH	THOMAS/ELIZABETH	
2187 MARSH	ED	
2188 MARSHALL	GEOFF	
2189 MARTIN	MARTHA	
2190 MARTIN	CYNTHIA B.	
2191 MARTIN	FLORENCE	
2192 MARTIN	IRENE	
2193 MARTIN	PAUL T. (MRS)	
2194 MARTIN	SALLEY B. & JAMES H.	
2195 MARTINET	GLENN	
2196 MARTINEZ	CAROLYN & RICHARD	
2197 MARTINO	G.	
2198 MARTINO	RITA M.	
2199 MARTINSEN	PATRICIA B.	
2200 MARZEUL	NICK	
2201 MASKAL	DONALD	
2202 MASON	ROBERT P.	CHESAPEAKE BIOLOGICAL LABORATORY
2203 MASSORT ?	MARIE	
2204 MATARANGELO	DANIELLE	
2205 MATEO	ANDREA	
2206 MATEO	GLADYS	
2207 MATHIES	DAVID KRATZ	
2208 MATHIES ?	KAREN LOVE	
2209 MATTALIANO	MARY ANN	
2210 MATTHEWS	MARGARET	
2211 MATTHEWS	MARION T.	
2212 MATTIA ?	KATHLEEN A.	
2213 MATTISON	RICHARD C.	
2214 MAURER	ALVIN	
2215 MAURER	REGINA	
2216 MAURO	IDA G.	
2217 MAXFIELD	CAROL	
2218 MAXWELL	JOHN	NJ PETROLEUM COUNCIL
2219 MAYER	ANGELE C.	
2220 MAYER	PATRICIA	
2221 MAYER	CLAIRE & FRED	
2222 MAYER	MARY W.	
2223 MAYHER	CATHERINE A.	
2224 MAYMON	LOIS	

2225 MAYURNIK	TOM	
2226 MAZUR	JUDITH	
2227 MAZZA	FRANK T.	TOWNSHIP OF UNION
2228 MAZZARELLA	EMIL D.	
2229 MC ADAMS	MARYLOU	
2230 MC CABE	JOEL D.	
2231 MC CLURE	MARY	
2232 MC COLLEY	CELIA	
2233 MC GEE	EVELYN	
2234 MC GOVERN	SUSAN	
2235 MC GRAW	ILLEGIBLE/JOHN	
2236 MC INTYRE	DENNIS	
2237 MC NALLY, JR	HARRY J	
2238 MC NAMIRE	EDNA	
2239 MC TEIGUE "	JOAN	
2240 McALLEN	JOHN	
2241 McALLEN	REGINA	
2242 MCCAFFREY	MICHAEL F.	
2243 McCARTHY	KRISTIN	
2244 McCARTHY	JEREMIAH M.	
2245 MCCARTHY	THERESA	
2246 McCONNELL	LORELIA ?	
2247 McCORMICK	ELEANOR	
2248 McCORMICK	ELIZABETH	
2249 MCCORNELL	ELLEN G.	
2250 McDERMOTT	GEORGE M.	
2251 McDERMOTT	DIANE	
2252 McENTEE	MELISSA	
2253 McFADDEN	ROSE	
2254 McGIFFIN	CHRIS	
2255 MCGILVRAY	JAMES & JOAN S.	
2256 McGRATH	HELEN	
2257 MCGRUTHER	BARBARA	
2258 McGUINNESS	MARLISS	
2259 McGUIRE	KIM	
2260 McINERNEY	BRIAN	
2261 McINTYRE	SALLY B.	
2262 McKAUGHAN	MOLLY	
2263 McKENNA	THOMAS	
2264 McKEON	JOHN F.	NJ GENERAL ASSEMBLY
2265 McKIER ?	JOHN J.	
2266 McKILLIP	LINDA	
2267 McLAIN	LISA RITCHIE	
2268 MCLENDON	JUDITH L.	
2269 McMorrow	Brian	
2270 MCNALLY	EVELYN/BOB	
2271 MCNAMARA	JOHN M. & MARY LUDIA	
2272 McNICHOLAS	KELLY	
2273 McPHEARSON	KRISTEN	
2274 McTAGGART	MARY	
2275 MCVEY	CHRISTY C.	
2276 MEAD	GARY	
2277 MECKELER	KURT	
2278 MEDICH	CATHERINE S.	
2279 MEEHAN	JOHN	
2280 MEHTA	SUMANT	
2281 MEICHE	ROBERT L.	

2283 MEIS	CONSTANTINA	
2282 MEIS	CONSTANTINA	
2284 MEISELS	JUDITH A.	
2285 MELAKE	SHARON	
2286 MELE	ART	
2287 MELES ?	ROBERT H.	
2288 MELIN	JOHN C.	
2289 MELLICK	SHELBY	
2290 MELLISH	MARJORY C.	
2291 MELLON	MATHEW	
2292 MELMAN	CLARA R.	
2293 MENDELSON	LOREN D.	
2294 MENEN ?	D.	
2295 MEO	AGNES	
2296 MERCHANT	N.	
2297 MEREWDA	MICHAEL	
2298 MERRILL	MARIAN JACOBS	
2299 MESSENLEHNER	ROBERT R.	
2300 MESSER	STANLEY	
2301 MESSERSMITH	CAROLE & JIM	
2302 MESSING	HAYLER	
2305 MESTER	MARY	
2303 MESTER	MARY	
2304 MESTER	JESSICA	
2306 METCHER ?	ROBIN SUE	
2307 METHVEN	BERNADETTE	
2308 METROCAVICH	KATHERINE	
2309 MEYER	ELEANOR	
2310 MEYER	JANICE S.	
2311 MEYER	ROBERT W.	
2312 MEYER	ELAINE	MONTCLAIR WOMEN'S CLUB
2313 MEYERS	ARLENE	
2314 MEYERS	MARGARITE	
2315 MICALÉ	THOMAS	
2316 MICHAEL	GEORGE	
2317 MICHEL	AL	
2318 MICHENFELDER	JOHN F.	
2319 MIKKELSEN	SALLY	
2320 MIKO	DOROTHY	
2321 MIKTUS	FLORENCE	
2322 MILANO	GASTONE	
2323 MILANO-TEDESCHI COLE	ANNE	
2324 MILBERG	NADINE L.	
2325 MILES	BARBARA HARRIS	
2326 MILES	PETER	
2327 MILFORD ?	JEAN A.	
2328 MILLA	GRACE	
2329 MILLER	JANE E.	
2330 MILLER	MARY KAY & ROBERT A.	
2331 MILLER	MICHAEL & SUZANNE	
2332 MILLER	MOREAN T	
2333 MILLER	MORRIS J.	
2334 MILLER	SUSAN M.	
2335 MILLER	THOMAS J.	
2336 MILLER	KERRY	
2337 MILLER	MARILYN	
2338 MILLER	BOB	KABRO OF NEW JERSEY, LLC

2339 MILLET	VINCENT	
2340 MINDE	ELLEN	
2341 MINERY	BONNIE	
2342 MINKOFF	SUSAN	
2343 MINUSKIN/ZONENSHIRE	MARCIA L./JEFFREY A.	
2344 MIRABITO	MARK	
2345 MIRALDO	PHILIP	
2346 MISH	JACQUE	
2347 MITCHELL	ALISON	
2348 MITCHELL	JOHN P.	
2349 MITCHELL	BARBARA	
2350 MITCHELL	CATHERINE E.	
2351 MITIE	JENNIFER	
2352 MITSHELE	MELISSA	
2353 MOHAN	JOAN	
2354 MOHN	JAMES	
2355 MOIR	ROBERT E.	
2356 MOLD	FREDERICK	
2357 MOLDER	CAROLYN MCKNIGHT	
2358 MOLDOVER	DR./MRS JONATHAN	
2359 MOLES	JUSTIN	
2360 MOLEY	LIBBY J.	
2361 MOLTZEN	FRANK	
2362 MONACCHIO	RICHARD & MICHELE	
2363 MONAHAN	JOHN	
2364 MONE	DONALD L.	
2365 MONGES	PEGGY	
2366 MONMA	CLYDE	
2367 MONTANTE	SALVATORE C.	
2368 MONTI	PAUL	
2369 MONTUORI	JOHN/AMY	
2370 MOORE	HAROLD A.	
2371 MOORE	JAMES B.	
2372 MOORE	TONI R.	
2373 MOORE	MILLICENT	
2374 MOORE	BARRY L.	
2375 MOORS	RUTH/WILLIAM	
2376 MORALES	CARLOS A.	
2377 MORAN	RICHARD C.	CITY OF CLIFTON
2378 MORAN	DONNA	
2379 MORETTO	JEANNIE & JOHN	
2380 MORGADO ?	JOSEPH & MARAHSEL	
2381 MORGAN	CARREL/DOROTHY	
2382 MORINITY	MAUREEN	
2383 MORRA	RICHARD	
2384 MORRIS	JOSEPH P.	
2385 MORRIS	DAVID H.	
2386 MORRIS	ROBERT J.	
2387 MORRIS	JOSEPH	
2388 MORRISON	IAN	
2389 MORTON	DEBORAH	
2390 MOSCHNER	NANCY/DON	
2391 MOSEL	MARILYN FLOREZ	
2392 MOSKOW ?	JANET M.	
2393 MOSS	BARBARA	
2394 MOYAN	VALERIE	
2395 MOYNIHAR ?	JOAN	

2396 MOZER	ELIZABETH	
2397 MROZ	DENISE	
2398 MUELLER	C ILLEGIBLE	
2399 MUENCH	STEPHANIE	
2400 MUFSON	LESLIE & SAM	
2401 MUGNIER	ELIZABETH A.	
2402 MUKAIDA	MARAID	
2403 MULHALL	LYNNE & JACK	
2404 MULHERIN	DOROTHY	
2405 MULLEN	PAT	
2406 MULLEN	JIM	PULTE HOMES
2407 MULLER	M.	
2408 MULLER	WILLIAM	
2409 MULROONEY	JACK	
2410 MUNDAY	VIVIAN	
2411 MUNELL	SUSAN & STEPHEN	
2412 MUNN	PATRICIA	
2413 MUNRO	LAETITIA	
2414 MURAWSKI	EDWARD	
2415 MURCIA	LUISA	
2416 MURPHY	MIRIAM	TOWNSHIP OF TEWKSBURY
2417 MURPHY	CONSTANCE	
2418 MURPHY	EDWARD D.	
2419 MURPHY	EVELYN	
2420 MURPHY	JUDI & KATIE	
2421 MURPHY	JUDITH P.	
2422 MURPHY	R.I.	
2423 MURPITH ?	BRIAN	
2424 MURRAY	ELISE & TOM	
2425 MURRAY	RAYMOND	
2426 MUSA	JOHN J.	
2427 MUSCARA	WENDY	
2428 MUSGRAVE	ELAINE R.	
2429 MYERS	CAROLE	
2430 NADELEN	ROSEMARIE	
2431 NADER	ADRIAN F.	
2432 NAGY	INGRID	
2433 NAHRA ?	KATHY	
2434 NAJARIAN	TAVIT O.	NAJARIAN ASSOCIATES
2435 NAPSHA	REGINA	
2436 NAPURANO	ROBERT	
2437 NARGI	ROBERT	
2438 NASHED	RUTH B.	
2439 NAVALLS, JR.	HARVEY K.	
2440 NAVON	GINA	
2441 NAWROCKI	J.	
2442 NAZARIAN	ARTEMIS	
2443 NEELY	L. MASON	TOWNSHIP OF EAST BRUNSWICK
2444 NEELY	JOANN	
2445 NEETZ	ROBERT	
2446 NEFF	ELEANOR B.	
2447 NEICHELINI	CAROL	
2448 NELINSON	GERALDINE	
2449 NELKEN	ELIZABETH	
2450 NELKIN	HELENE	
2451 NELSON	BARBARA A.	
2452 NELSON	LISA	

2453 NELSON	LISA A.	
2454 NELSON	CAROL	
2455 NEMETH	ROSE S.	
2456 NESTOR	JOANNE M.	
2457 NESTOR	JOSEPH P.	
2458 NESTOR	MARGARET O.	
2459 NESTOR	ANNA M.	
2460 NEUBAUER	BEVERLY	
2461 NEUMAN	LORI	
2462 NEW JERSEY PIRG (9,975 letters)		
2463 NEWLAND	ROBERT	
2464 NEWMAN	JENNIFER L.	
2465 NEWTON	PRISCILLA	
2466 NICCO FINI	ADOLPH	
2467 NICHOLS	ANNE	
2468 NICHOLS	ALBERT	
2469 NICHOLSON	CAROLYN	
2470 NICOSIA	CHARLES J.	
2471 NIDE	M.L.	
2472 NIEDERER	JESS	
2473 NIETMAN	LINDA	
2474 NIEVES	DANIEL	
2475 NILES	ELLA	
2476 NIMMO	ELYN	
2477 NIMSZ	NANCY	
2478 NIOLA	JON	
2479 NISSEN	MICHAEL	
2480 NITA	DONA	
2481 NITA	G.	
2482 NIXON	DAVID	
2483 NOGAKI	JANE	COALITION AGAINST TOXICS
2484 NOLAN	PETER T.	
2485 NOLAN	BETH	
2486 NOLAN	PETER C.	
2487 NOLAN	ANDREW	
2488 NOLON ?	KRISTOPHER	
2489 NONNEMACHER ?	FAY	
2490 NORAMS ?	BETTY	
2491 NORCRESS ?	MARGARET J.	
2492 NORDAHL	BILL	
2493 NORDHEIMER	STUART	
2494 NOTARI	TERESA	
2495 NOVELLINO	LOUIS	
2496 NOWAK	DARLENE & HEINO ?	
2497 NOWICKI	BARBARA	
2498 NUGENT	MAUREEN	
2499 NUGENT	MONICA	
2500 NUNES	MARIA L.	
2501 NUTT	MARY JO	
2502 NYE	BETTY C.	
2503 OAKES	JOANN	SAVE OUR SPLIT ROCK
2504 OAKES	CAROL	
2505 OBERA	BRIAN	
2506 OBORNE	JOHN J.	
2507 O'BRIEN	DEBBIE M.	
2508 O'BRIEN	MARY	
2509 O'CARROLL	LYNNE	

2510 OCHS	WILLIAM H.	
2511 OCHSNER	MICHELE	
2512 O'CONNELL	RICHARD A.	
2513 O'CONNOR	TIMOTHY	
2514 ODGERS	CARRIE	
2515 OELEY	S. W.	
2516 OELKERS	KENNETH H.	
2517 OGG	SANDRA L.	
2518 O'HANDLEY	DONNA M.	
2519 O'HARA	DANIEL	
2520 O'KEEFE	PATRICK J.	NJ BUILDERS ASSOCIATION
2521 OLEARY	CATE	
2522 O'LEARY	SARAH	
2523 O'LEARY	DAVID	
2524 OLES	CAROLYN	
2525 OLEY	ARLENE	
2526 OLIVER	DENISE H.	
2527 OLSON	VERA & WALTER	
2528 O'Malley	Doug	NJ PIRG
2529 O'NEILL	BETH A.	
2530 O'NEILL	EDWARD C.	
2531 ONNEMBO	KRISTINE	
2532 ONORNT	ILLEGIBLE	
2533 ONTELL-MOLES	ROBYN	
2534 ONUCKI	BLANCHE E.	
2535 OPPENHEIM	NANCY B.	
2536 O'REILLY	JENNIFER	
2537 ORLANDO	ANNE S.	
2538 ORLANDO	JOHN	
2539 O'ROURKE	JOAN	
2540 O'ROURKE	M. M.	
2541 O'ROURKE	DONALD	
2542 ORR	BECKIE P.	
2543 ORSINI	ADELE	
2544 OSBORN	ELAINE	
2545 OSIECKI	WALTER	
2546 OSTANSKI	CAROL	
2547 OSTERMANN	JOAN	
2548 OSTERMAYER	PAUL	
2549 OSUCH	ADAM	
2550 O'SULLIVAN	ELIZABETH	
2551 OSWALD	EDWARD	
2552 OTTS ?	JOHN	
2553 OVENSTEIN	JOYCE E.	
2554 OVERTON	ANNE S.	
2555 OWANIAN	NERSKS ?	
2556 OWEN	JANET H.	
2557 OWEN	MARY H.	
2558 OWENS	JOHN C.	
2559 P. ILLEGIBLE	GLORIA	
2560 PACE	CATHERINE E.	
2561 PACHANSKI	JOSEPHINE	
2562 PACIFICO	DOROTHY	
2563 PADDOCK	LAURA	
2564 PAGANO	ANTHONY M.	
2565 PAGE	DONALD	
2566 PAGE	MARY	

2567 PAGE	DENNIS
2568 PAILLEX	CHIP
2569 PAINE	ELIZABETH LOUISE
2570 PAITURIGHT	JEAN & THOMAS
2571 PALAE	VICTOR J.
2572 PALELLA	DENISE J.
2573 PALENTCHAN	ROSE
2574 PALERMO	PATRICIA E.
2575 PALIDIS	SOFIA
2576 PALINKAS	ALEXIS
2577 PALMER	MATTIE
2578 PALSI ?	NEGI ?
2579 PANCSEK	REITA & GUSTAR
2580 PANELLA	STEVE
2581 PANFILL ?	BETH MARIA
2582 PANJWAUI ?	H. M/M
2583 PANNU	HARJOT SINGH
2584 PANYI	LIA
2585 PANZICA	JOSEPH
2586 PAOLA ?	MARY
2587 PAPA	KRISTINE M.
2588 PAPP	ROBERT J.
2589 PARADISO	EDNA C.
2590 PARDO	DANIEL
2591 PARISI	MR/MRS WILLIAM
2592 PARISI-SMITH	NICOLE & SANDRA
2593 PARKER	MARY W.
2594 PARLATO	SUSAN M.
2595 PARRISH	CATHERINE L.
2596 PARTHEYMUELLER	CONRAD
2597 PARU	ALINE R.
2598 PASICZNYK	DAVID L.
2599 PASSERA	EVELYN
2600 PASSUMATO	RUTH
2601 PASZAMANT	JOAN S.
2602 PASZEK	PATRICIA
2603 PASZEK	PATRICIA
2604 PATEL	VARSHA
2605 PATERUTH ?	BARBARA
2606 PATTERSON	JAMES
2607 PATTERSON	CAROL B.
2608 PATTERSON	LAURA E.
2609 PATTERSON	KATHARINE
2610 PAUL	NORMA
2611 PAULSHADE ?	BEVERLY
2612 PAVLIK	NICK & MRS. E.
2613 PAVLOFF	ILLEGIBLE
2614 PAWLOWSKI	RENATA
2615 PAZEL	MARCIA B.
2616 PEARSON	GEORGE
2617 PEARSON	RENIE
2618 PEDERSEN	ELLEN
2619 PEDRAJA ?	LEONORA
2620 PEDUTO	PAUL A. M/M
2621 PEELE	DANA
2622 PEELE	HALEY
2623 PEER	FRAN & JIM

2624 PEER ?	BILL
2625 PEL ?	BENJAMIN B.
2626 PELLEGRINO	NANCY
2627 PELLSBURY	JOYCE
2628 PELOUZE	PIERCE AND DOLORES
2629 PENDERGAST	TERRI
2630 PENTIOUS	VIRGINIA G.
2631 PENTO	KEVIN
2632 PEPINO	MARION
2633 PEPOSE	ELLEN
2634 PERES	EUGENIA
2635 PEREUN ?	G.
2636 PEREZ	MARTIN/LYDIA
2637 PEREZ	MANUEL
2638 PERFIT	DIANNE
2639 PERILLO ?	CAROL
2640 PERINA ?	CHRISTOPHER
2641 PERKINS	DONNA MARIE
2642 PERRY	SAFIYYAH
2643 PERSAD	WINSTON
2644 PERSAH ?	DARLENE
2645 PERTES	MADELINE
2646 PETERNITH	NANCY K.
2647 PETERS	DOUGLAS F.
2648 PETERS	LEE
2649 PETERSON	JOSEPH & JOAN
2650 PETERSON	ROBERT E.
2651 PETERSON	KATHRYN
2652 PETERSON	HELEN
2653 PETIK	THOMAS J.
2654 PETIX	JULIE
2655 PETRANKER	EDITH
2656 PETRUCCELLI	BARBARA
2657 PETUA	SUSAN J.
2658 PEZZA	BARBARA
2659 PHILLIPS	DENINE
2660 PHILLIPS	R.C. & L.M.
2661 PHOEL	WILLIAM
2662 PICCIRELLO	MINDY
2663 PICHARD	RODGER
2664 PIKE	EDITH RIES
2665 PILLEPICH	JOHN A.
2666 PINNEY	MARY
2667 PINTO	LEONARD A.
2668 PINTO ?	PATRICIA A.
2669 PIRES	ANDREA
2670 PISANI	EILEN
2671 PISANO	CAROL A.
2672 PISKLAK	ROSEMARIE
2673 PISZAN	STEPHEN & JANET
2674 PITALE	ROSE
2675 PITOSCIA	MICHAEL
2676 PIZARRO	JUDY
2677 PIZZA	PAT
2678 PIZZI	MICHAEL
2679 PLENK	MARGARET
2680 PLETCHER	CHARLES

2681 PLICK	VICTORIA	
2682 PLIKSHA ?	DONNA	
2683 PLOTKIN	ALEXIS	
2684 PLUMMER	CHRISTOPHER	
2685 POLCHINSKI	PHILIP R.	
2686 POLICASTRO	JOAN	
2687 POLLAL ?	BARBARA	
2688 POLO	DAVID J.	
2689 PONSI	JOSEPH C.	
2690 POON	CINDY	
2691 POPOLIZIO	CARLO	
2692 POPPE	SUE	
2693 PORKKA	D.	
2694 POSS	ELIZABETH	
2696 POST	KENNETH W.	
2695 Post	Nancy	
2697 POTASHNICK	JON	
2698 POUKCOIN ?	LAURA	
2699 POWELL	MARION	
2700 POWERS	JOEL J.	
2701 POZZI	RAVEN	
2702 PRADAN	NICHOLAS D.	
2703 PRADAN	YVONNE M.	
2704 PRAGN ?	SUSAN	
2705 PRAJOPATI	SANGITA	
2706 PREE	ALBINA	
2707 PREISSMAN ?	RUTH A.	
2708 PRESS	JENNIE	
2709 PRESS	WILLIAM	
2710 PRESSER	SANDRA	
2711 PRESTON	ILLEGIBLE	
2712 PREZIOSI	FRANCES	
2713 PRICE	CHRIS	
2714 PRICE, JR.	MRS./MR WILLIAM E.	
2715 PRIGOREE	MICHAEL	
2716 PRINCE	RUTH	
2717 PRINCIPATO	LETITIA O.	
2718 Pringle	Dave	New Jersey Environmental Federation
2719 PRIOR	BIRGIT	
2720 PRISCO	AMY	
2721 PROCHNAW	LIVIA	
2722 PROPER	ELLA E.	
2723 PUDER	SUSAN	
2724 PUGLIGE	BEATRICE	
2725 PUGLISI	RICHARD	
2726 PULLEY	CAROL	
2727 PULLMAN	CHESTER A.	
2728 PURCELL	MONIQUE	DEPT OF AGRICULTURE
2729 PURDY	MARY LOUISE	
2730 PUSZKAR	MARIA	
2731 PUTIGNANO	RICH	
2732 PYNAHUE	F. P.	
2733 QIN	JIMMY	
2734 QUAINANCE	CHARLOTTE W.	
2735 QUAN	EILEEN	
2736 QUARANTA	NICHOLE	
2737 QUARANTA	MATT	

2738 QUARANTA	PEGGY
2739 QUARANTA	STEPHEN
2740 QUARANTA	THOMAS A.
2741 QUIGLEY	KATHY
2742 QUINN	JUNE
2743 QUINN	TAMARA
2744 QUINZER	MATTHEW
2745 R ILLEGIBLE	REBECCA
2746 RABINOWITZ	SANDERS
2747 RACANIELLO ?	ROBERTA
2748 RACHELLE	FRANK & RUTH
2749 RACIK	PATRICIA/JOHN
2750 RACZKIEWICZ	SUSIE
2751 RAHNER	KIM
2752 RAINE	CAROL
2753 RAINE	ROSALIE
2754 RAMGE	R.
2755 RANA	KATHLEEN
2756 RANAWERRA	RUCHIRA
2757 RANSOM	MARY LYNN
2758 RAOS	JENNIFER
2759 RAPP	HAROLD
2760 RAPP	EDWARD J.
2761 RASIMOWICZ	KRISTEN
2762 RAY	KATHLEEN
2763 RAY	TODD
2764 RAY	ELLEN
2765 RAYMOND	ROBERT B.L.
2766 RAYNOR	CAROLYN A.
2767 REAGAN	CHARLES A.
2768 REALE	SALVATORE
2769 REBOLLO	DANIEL
2770 REDDAN	BEVERLY L.
2771 REED	MARGARET A.
2772 REEPS	MICHAEL
2773 REGO	TONY
2774 REGRUT	REGGIE
2775 REHILL	DOROTHY
2776 REID	ROBERT AND NANCY
2777 REILLY	BARBARA
2778 REILLY	RICHARD
2779 REIMER	EDNA W.
2780 REIN	DIANE
2781 REINERS	VICTORIA
2782 REISS	BEATRICE
2783 REISS	JOEL
2784 REMEZ	ANDREA
2785 REMICK	BARBARA
2786 RENZI	JULIE
2787 REPOLL	LORRAINE
2788 RESNICK	KAREN
2789 RESP	LEONA
2790 REVEL	DENNIS
2791 REVER, SR.	ROY R.
2792 REVERE ?	S. R.
2793 REVESY ?	BRUCE
2794 REYAULOS ?	G.

2795 REYNOLDS	JOSEPH S.	BAYSHORE REGIONAL WATERSHED COUNCIL
2796 REYNOLDS	MONICA	
2797 REYNOLDS	REBECCA	
2798 REYNOLDS	RENEE	
2799 RIANO	MARGARET A.	
2800 RIBOT	DOUGLAS/HARRIET/SEYMOUR	
2801 RICCI	DEBRA	
2802 RICE	ALFRED & BARBARA	
2803 RICH	BARBARA A.	RANCOCAS CONSERVANCY
2804 RICHARD	JUDITH	
2806 RICHARDS	GLADYS	
2807 RICHARDS	ROBERT	
2805 RICHARDS	GREG & DEBORAH	
2808 RICHARDSON	STEFANIE	
2809 RICHKO	CARL	
2810 RICHMOND	ALICE	
2811 RICHMOND	HENRY	
2812 RICHTER	ROSALIE	
2813 RICKETTS	MICHAEL	
2814 RICKI	PAMELA & JOSEPH	
2815 RICOLETTA	MARGARET	
2816 RIEMER	DONALD/ILIZABETH	
2817 RIGGIO	JOHN	HOFFMANN-LaROCHE, INC.
2818 RIHA	H. P.	
2819 RILEY	PATRICIA & JOHN	
2820 RILEY	REDA	
2821 RINALDI	SUE	
2822 RINALDI	ROSE	
2823 RINEHART	SYLVIA	
2824 RINHART	MARTHA S.	
2825 RIOLETI ?	FRAN (MRS.)	
2826 RIOS	STEVEN	
2827 RISANO	WILLIAM F.	
2828 RIVERA	EFRAIN	
2829 RIVERA	DIANA	
2830 RIVERA-KRON	CAROL	
2831 RIVERS	ARLENE	
2832 RIZZOLO	CLARE D.	
2833 RIZZUTO	JULIE	
2834 ROARTY	PEG	
2835 ROBBINS	MARGARET S.	
2836 ROBERTS	MARIA KATHLEEN	
2837 ROBERTS	G. W. M/M	
2838 ROBERTS	JEAN	
2839 ROBERTS	RANDI	
2840 ROBERTSON	WILLIAM & LAVERNE	
2841 ROBINSON	R.J.	
2842 ROBINSON	ALBERT H/MARIE T.	
2843 ROBINSON	ALICE	
2844 ROBISON	EMILY A.	
2845 ROBLES	JORGE	
2846 ROBSON	MICHELE	
2847 ROCCO	AL	
2848 ROCHA	LAURA	
2849 RODRIGUES	MR/MRS. GIL	
2850 RODRIGUEZ	MARIE I	

2851 RODRIGUEZ	JOSEPH	
2852 RODRIGUEZ	PAUL	
2853 RODRIQUEZ	MARI	
2854 ROEDERER	GREGORY	
2855 ROGERS	PEGGY S.	
2856 ROGERS	S.	
2857 ROHER ?	ROBERT	
2858 ROLDIN ?	ILLEGIBLE	
2859 ROLLIN	LISA	
2860 ROMANSIC	GERALDINE	
2861 ROMARRO	JOHN L. & DIANE M.	
2862 ROME	S. M/M	
2863 ROMOLA	THERESA	
2864 RONA	F.S. (MRS.)	
2865 RONEY	MICHAEL	
2866 ROONEY	KATHLEEN	
2867 ROONEY	AUDREY	
2868 ROSA	HELEN	
2869 ROSE	BERNICE	
2870 ROSEMAN	SANDRA A.	
2871 ROSEN	MR/MRS. BEN	
2872 ROSEN	SHIRLEY	
2873 ROSEN	REBECCA	
2874 ROSENBERG	AVIVA	
2875 ROSENBERGER	MARION	
2876 ROSENTHAL	MEYER	
2877 ROSENZWEIG	EDWARD	
2878 ROSS	RUTH	
2879 ROSS	JEROME J.	
2880 ROSS	RUTH E.	
2881 ROSSI	IRENE H.	
2882 ROSSI	BRUCE A.	TOWNSHIP OF UNION
2883 ROSSIN	LINDA	
2884 ROSTRON	WILLIAM E.	
2885 ROTH	ANN E.	
2886 ROTHMAN	JONATHAN	
2887 ROTHSTEIN	JUDY	
2888 ROTTENGEN	MARY DONNA	
2889 ROUNDS	JEREMY	
2890 ROUSE	ROBERT	
2891 ROVERE	ROBERT J.	
2892 ROWE	JOSEPHINE	
2893 ROYLE	DENISE D.	
2894 RUBIN	CONSTANCE S.	
2895 RUBIN	NANCY	
2896 RUDOLPH	MARGARET	
2897 RUDOLPH	MARSHA	
2898 RUDOLPH	ROBERT	
2899 RUEHALA	IRENE	
2900 RUFFINI	TRACEY	
2901 RUGG	MACK	
2902 RUGGIERO	ANNE	
2903 RUITER	J. BART	DUPONT ENGINEERING
2904 RUIZ	RUDOLFO	
2905 RUIZ-MESA	MARIO J.	
2906 RUNDE	GLADYS H.	
2907 RUNNER	DORIS L.	

2908 RUOPP	HOWARD	
2909 RUPP	VIRGINIA M.	
2910 RUSAY	BRENDA	
2911 RUSH	PAT & JOE	
2912 RUSIGNOLA	KATHY	
2913 RUSSELL	JEAN & DAVID	
2914 RUSSELL	LOUISE	
2915 RUSSELL	SALLY	
2916 RUSSELL	WILLIAM C.	
2917 RUSSELL ?	JOHN E.	
2918 RUSSO	JANE	
2919 RUSSO	ANTHONY	CHEMISTRY COUNCIL OF NJ
2920 RUSSO	MARCELLA	
2921 RUSSO	NEIL	
2922 RUSSO	PAUL	
2923 RUTAN	WENDY	
2924 RYALIT ?	JANIE	
2925 RYAN	ROBERT	
2926 RYAN	SEAN	
2927 RYDER	CHARLES T.	
2928 RYNEZ ?	JUE ?	
2929 S ?	CRAIG	
2930 S.	A.	
2931 S. ILLEGIBLE	MARK	
2932 SABATELLI	ELIZABETH J.	
2933 SABO	PATRICIA/JOHN	
2934 SACH ?	JOE	
2935 SACHAU	B.	
2936 SAFAR	MILDRED	
2937 SAFFIOTTI	JOANNE	
2938 SAGER	FLORENCE M.	
2939 SAIA	MARY JANE	
2940 SAILEY	MARILYN L.	
2941 SALAMON	STANLEY	
2942 SALCESS ?	DEBORAH A.	
2943 SALIM	REV./MRS RAYMOND	
2944 SALLEVELT	REGINA	
2945 SALZER	GAIL	
2946 SAMILJAN	CHARLES E.	
2947 SAMILJAN	PENELOPE E.	
2948 SAMKOFF	JACOB S. & NAOMI S.	
2949 SAMSON	ELAINE	
2950 SANCHEY	MARIA	
2951 SANCHEZ	MARYANNE	
2952 SANCHO	JOHN	
2953 SANDERS	MATTHEW	
2954 SANDERS	MARY	
2955 SANDERSON	PAUL	
2956 SANDS	TRICIA	
2957 SANGES	CAROL E.	
2958 SANGIOVANNI	JOAN	
2959 SANTI ?	FINANMAI ?	
2960 SANTORA	SUZANNE	
2961 SAPONARO	ROSEMARIE	
2962 SARDO	VINCENT W.	
2963 SARRA	ALEXANDRIA	
2964 SARRE	OLGA	

2965 SASSO	MARYANN	
2966 SAUER	ROGER	
2967 SAUERS	RONALD	
2968 SAVAGE	NUTZI	
2969 SAVOIE	EDMOND A. & BRIETTA D.	
2970 SAXTON-GRANATO	KATHRYN	
2971 SCALLO	JEANENE	
2972 SCANT ?	KEVIN	
2973 SCARCELLA	CLAIRE/SAL	
2974 SCARPA	CATALDO/ARIANE	
2975 SCARPELLI	JOSEPH C.	TOWNSHIP OF BRICK
2976 SCARPELLI	PETER C.	TOWNSHIP OF NUTLEY
2977 SCAVETTO	JOHN	
2979 SCHADE	WILLIAM	
2978 SCHADE	WILLIAM	
2980 SCHAEFFER	MARK & AMY	
2981 SCHAEFFER	STEVE	
2982 SCHAEFFER	JANINE	
2983 SCHAFER	JOHN	
2984 SCHAFFNER	AUDREY	
2985 SCHARF	JOEL	
2986 SCHARNECK	HARRIET	
2987 SCHEDINGER	ROBERT & JOAN	
2988 SCHEIBER ?	LAWRENCE	
2989 SCHEIDER	CAROLYN	
2990 SCHEIDT	SOPHIE	
2991 SCHELL	EDWARD	
2992 SCHELLER	JUNE L.	
2993 SCHEMELIA	JESSICA	
2994 SCHESSER	EDWARD/RUTH	
2995 SCHIFFER	CATHERINE S.	
2996 SCHILLING	LAURA	
2997 SCHINDLER	GEORGE	
2998 SCHINK	MR/MRS D.	
2999 SCHIRRMACHER	DONALD L.	
3000 SCHLAFFER	COLEEN & MARVIN	
3001 SCHLESINGER	DIANA	
3002 SCHLOSSBERG	SEYMOUR	
3003 SCHLOSSER	THOMAS J.	
3004 SCHMELZ	LANCE	
3005 SCHMELZER ?	HENRY	
3006 SCHMID	ELIZABETH	
3007 SCHMID	ROBERT W.	
3008 SCHMIDL	MARK	
3009 SCHMIDT	DEBORAH ANN	
3010 SCHMIDT	RICHARD/GRACE ?	
3011 SCHMIEDER, JR.	L.F.	
3012 SCHMOYER	REBECCA	
3013 SCHNAPER	ILYSE T.	
3014 SCHNEIDER	STEPHANIE	SCHOOR DEPALMA
3015a SCHNEIDER	PAUL H.	Giordano, Halleran & Ciesla on behalf of K. Hovnanian
3015b SCHNEIDER	PAUL H.	Giordano, Halleran & Ciesla on behalf of Pulte Homes
3016 SCHNEIDER	A. JOSEPH	
3017 SCHNEIDER	MINDY ?	
3018 SCHNELL	DEBBIE	

3019 SCHOMER	ELEANOR S.
3020 SCHREIBER	JUNE
3021 SCHROEDER	WILLIAM D.
3022 SCHUBERT	GERD
3023 SCHULTZ	DOREEN
3024 SCHULTZ	ETHEL
3025 SCHULTZ	STEPHANIE
3026 SCHULZ	NOEL P.
3027 SCHUMACHER	DORIS & EDWARD
3028 SCHUSTER	PHILIP
3029 SCHVEJDA	TINA
3030 SCHWARO ?	KATHY
3031 SCHWARTZ	BRETT
3032 SCHWARTZ	HOWARD
3033 SCHWARZ	RENATA
3034 SCHWEITZER	EVELYN
3035 SCHWIND	SUSAN COYOTE
3036 SCIRE	RICK
3037 SCOTT	TERESA
3038 SCOTT	SHEILA M.
3039 SCOTT	CLAIRE
3040 SCOTT	KATH ?
3041 SCOTTO	FRANK
3042 SCOVILLE	JUDITH H.
3043 SCRAVER	ROBERT
3044 SCUTERI	WINIFRED
3045 SCUTRO	ANTHONY
3046 SCUTTI	NICHOLAS
3047 SEAN	MICHAEL
3048 SEBETICH	MICHAEL J.
3049 SECKER	BARBARA
3050 SEELASKY	EDWARD & GLORIA
3051 SEELBACH	BARBARA
3052 SEGAL	EILEEN
3053 SEGUTTA ?	ROSEMARY
3054 SEIFERT	THOMAS
3055 SEIFRIED	ANNE MARIE P.
3056 SEIGA	ANTHONY
3057 SEIGEL	ALISON
3058 SELIGSON	CHARLES
3059 SELMANN	MIRIAM H.
3060 SELTER	LAWRENCE G.
3061 SELTZER	CLAIRE
3062 SEMON	THOMAS
3063 SENANEYAKE ?	AMANDA
3064 SERBIA	CHRISTINE L.
3065 SERRA	KATHLEEN
3066 SERSEN	JEANNETTE
3067 SESTO	KAREN A.
3068 SEVERINI	MAUREEN
3069 SHAFFER-KOROS	CAROL
3070 SHAH	R. N.
3071 SHALACK	CHANTELL
3072 SHANDOR	MARY JEAN
3073 SHAO	DUWANG
3074 SHAPELLA	RON

Association of Environmental
Authorities (AEA)

3075 SHAPIRO	MONA J.	
3076 SHARKEY	M.	
3077 SHARKEY ?	M.	
3078 SHARON-SHINAS	GEORGE & MARIA	
3079 SHAUNESEY	PHYLLIS B.	
3080 SHAW	LLOYD B.	
3081 SHAW	RUTH H.	
3082 SHAY	SHARON	
3083 SHEEHAN	HELEN E.	
3084 Sheehan	Bill	Hackensack riverkeeper
3085 SELLER	MARILYN	
3086 SHELOWSKY	GEORGE	
3087 SHEN	VIRGINIA	
3088 SHENTON	CHRISTINE	
3089 SHERIDAN	PHILIP O.	
3090 SHERMAN	ROZALYN	
3091 SHERN	MR/MRS JERRY	
3092 SHERWOOD	JEAN A.	
3093 SHIELDS	ROBERTA	
3094 SHILLINGER/GAGGINI	SANDRA/GREGG	
3095 SHINN	ROBERT, ROXANE, CORBETT&MAX	
3096 SHORE	SUSAN	
3097 SHORT	MARY	
3098 SHORT	TARA	
3099 SHOULDIS	JUDITH	
3100 SHUELL	DONNA	
3101 SIBERINE	RUSS	
3102 SIEBERT	LYNN L.	THE BURNHAM PARK ASSOCIATION
3103 SIECKE	MARTIN	
3104 SIKORSKI	EDWARD	
3105 SILEO	THOMAS & OLIA	
3106 SILVA	TERESA	
3107 SIMAKASKI	MARK	
3108 SIMMERS	JEFFREY	
3109 SIMMONS	BILL	MONMOUTH COUNTY BOARD OF HEALTH
3110 SIMONE-VIDAL ?	SUSAN	
3111 SIMPKINS	DEBORA	
3112 SIMPKINS	DAVID	
3113 SIMPSON	D. L.	
3114 SIMPSON	MARIE R.	
3115 SINCLAIR	JIM	New Jersey Business and Industry Association (NJBIA)
3116 SINCLAIR	HELEN	
3117 SINDEN	GRACE	
3118 SINGER	JEREMY	
3119 SINGER	DAISY	
3120 SINGER	LAWRENCE J.	
3121 SINGER	ROBERT	
3122 SINGH	SACHCHIDA	
3123 SINNOTT	KATHLEEN E.	
3124 SIPE	CATHERINE	TOWNSHIP OF CLINTON
3125 SIPE	ROBERT F.	
3126 SIPPPIE-GORA	JO	
3127 SIRKEN	NORMA S.	
3128 SIROTNAK/BECK	WILLIAM/SANDRA	

3129 SISKIND	DIANA	
3130 SISS	GLENN R.	
3131 SIVER	JANE	
3132 SIX	CHARLES V.	
3133 SJONILL ?	ED R.	
3134 SKAN	GEROGE H.	
3135 SKELLY	JOHN	
3136 SKELTON	DIANE	
3137 SKIERSKI	CHRISTINE	
3138 SKINNER	CHARLOTTE	
3139 SKLAR	NEIL & PHYLLIS	
3140 SKOVE	PETER	
3141 SLAGENITH ?	ILLEGIBLE	
3142 SLAHETKA	THOMAS	
3143 SLAN	HENRY	
3144 SLATER	JOHN	
3145 SLOAN EL	KAREN M.	
3146 SLOAT	VERONICA	
3147 SLOCUM	CHARLES & BETTY ANN	
3148 SMALL	GEORGE L.	
3149 SMALLEY	ROWENA	
3150 SMALLEY	LESLIE A.	
3151 SMALLEY	LOUISE C.	
3152 SMELTZER ?	WILLIAM	
3155 SMIGIELSKI	ROBERT	
3153 SMIGIELSKI	LUDWIK	
3154 SMIGIELSKI	ROBERT	
3156 SMILER	BONNIE	
3157 SMILLIE	NANCY	
3172 SMITH	ALLISON W.	
3173 SMITH	JAMES J.	
3158 SMITH	LEIGH	
3159 SMITH	JAMES F.	
3160 SMITH	KATE	
3161 SMITH	KIM	NJ ENV FEDERATION
3162 SMITH	GEORGE	
3163 SMITH	WAYNE	TOWNSHIP OF IRVINGTON
3164 SMITH	ANNE M. & RAYMOND C.	
3165 SMITH	COLON H.	
3166 SMITH	JAMES	
3167 SMITH	JAMES C.	
3168 SMITH	LOREN P.	
3169 SMITH	MICHAEL C.	
3170 SMITH	DONNA J.	
3171 SMITH	GLORIA	
3174 SMITH ?	BEVERYL LONG	
3175 SMOYER	MICHAEL	
3176 SMUTKO	TRACY	
3177 SNYDER	HARRIET	
3178 SNYDER	LONNIE & LAURA	
3179 SNYDER	MARIAN	
3180 SNYDER	LEE	
3181 SNYDER	SHANNON	
3182 SOARES	ANDRIANO	
3183 SOCLA	MARJORIE C.	
3184 SOFF	RAYMOND M.	
3185 SOLICLOFF ?	IMELDA	

3186 SOLIMAN	MICHAEL	
3187 SOLINSKI	EDWARD L.	
3188 SOLLISCH	PAULINE	
3189 SOLODARE	THEODORE	
3190 SOLOMON	BEVERLY	
3191 SOMERS	JULIA	GREAT SWAMP WATERSHED ASSOC
3192 SOMMER	DOROTHY	
3193 SOMMER	CLAIRE	
3194 SOMMER	JOSEPH	
3195 SON	DAVE	
3196 SONATORE	ILLEGIBLE	
3197 SONDERGARD	ROSEMARIE	
3198 SONDERVAN	BARBARA	
3199 SOONG	BRENDA	
3200 SOUTHWELL	MICHAEL	
3201 SPADAFORU	LUANN	
3202 SPANN	KATE	
3203 SPARLING	ELIZABETH M.	
3204 SPAUR	ELLEN	
3205 Specht	Steven	Brick Township MUA
3206 SPETGANG	IRWIN & TILLY	
3207 SPIEGEL	GEORGIA	
3208 SPIEGEL	NIKKI/SIG	
3209 SPIEGELHOFF	COLLEEN WEBER	
3210 SPIELBERGER	JOYCE	
3211 SPILLANE	THOMAS	
3212 SPINO	MARTHA	
3213 SPRAY	JOANN L.	
3214 SPRINGER	CATHERINE E.	
3215 SPRINGMANN	MARGARET C.	
3216 Stackelberg	Paul	USGS
3217 STADTMUELLER	CHRISTINE	
3218 STAFFORD	CHRISTOPHER	
3219 STAFFORD	J.	
3220 STAGNITTO	CHARLES S.	
3221 STAHL	RUTH A.	
3222 STAHL ?	PAULETTE	
3223 STAMM	RON	
3224 STANFORD	BLANCHE	
3225 STANFORD	MARY ANN	
3226 STANGE	TOM	
3227 STANLEY	BRYANT & HARRIET	
3228 STARITA	GLORIA E.	
3229 STARK	MARGARET B.	
3230 STARR	MELISSA	
3231 STATTUS	H.	
3232 STEIDL ?	GREG	
3233 STEIN	RICHARD T.	
3234 STEINBRECHER	SUSAN	
3235 STEINER	SHIRLEY	
3236 STEINFELD	THOMAS	
3237 STEINHARDT	ANNETTE L.	
3238 STEINHOFF	CHRISTINE & ROBERT	
3239 STENSGAARD	DOT	
3240 STERM ?	CHRIS	
3241 STERN	JACK I.	

3242 STERN	VOLKER	
3243 STERNAD	ANITA	
3244 STERNBERG	DANIEL & PHYLLIS	
3245 STEVENS	JIM	
3246 STEWAR	W. V.	
3247 STEWART	ROBERT	
3248 STEWART	SYDNEY	
3249 STIEH	RUTH & DONALD	
3250 STIELTS	MELDON M/M	
3251 STILE	SHIRLEY	
3252 STILES	ERIC	NJ AUDUBON SOCIETY
3253 STILLMAN	GERALD	
3254 STINE	AUDREY	
3255 STIRES	AUME	
3256 STOCK	ANN	
3257 STOGDILL	GARY	
3258 STOGDILL	HELEN	
3259 STOGDILL	LAURA	
3260 STOGDILL	MARK	
3261 STOHN ?	ALLEN	
3262 STOLA ?	CHRIS	
3263 STOLARZ	DOUGLAS F.	
3264 STOLER	ALICE	
3265 STOLL	ERYN	
3266 STOLL	ROBIN	
3267 STOLTZFUS	MICHAEL	
3268 STONE	KEITH	
3269 STONE	MARYANN	
3270 STONE	RALPH J.	
3271 STONEHAN	MICHELE	
3272 STONIER	MARIA R.	
3273 STORUT	DEBRA	
3274 STOUT	JESSE	
3275 STOYLE	CHERYL	
3276 STRACK	KATHLEEN	
3277 STRAND	BARBARA	
3278 STRASBURGER	ALLEN	
3279 STRASS	ELAINE	
3280 STRICKER	PETER	
3281 STRICKHOLM	JEAN & HARRY	
3282 Stringer	Michael	New York/New Jersey Bay Keeper
3283 STROH	CONSTANCE	UPPER ROCKAWAY RIVER WATERSHED ASSOC
3284 STROHM	RUTH	
3285 STROMBERG ?	KATHY	
3286 STUART	GARY	
3287 STUCKER	PATRICIA	
3288 STULLENBURGER	MARK	
3289 STYS	MATTHEW	
3290 SUCKOW	BARBARA	
3291 SUCKOW	DOUGLAS	
3292 SUCKOW	ELIZABETH	
3293 SUGAR	NINA	
3294 SULLIVAN	MAURA	
3295 SULLIVAN	MAUREEN	
3296 SURMAN	MARILYN	
3297 SUSMAN	DAVID	

3298 SUSSMAN	SHERYL	
3299 SUTER	JOHN	
3300 SUTTERBAY	ELLEN BETH	
3301 SUYDAM	ORION	
3302 SUZOKI ?	YOSHHIRO	
3303 SVEDMAN	MARGARETTA L.	
3304 SVENSSON	AUDREY	
3305 SWALE	JAMES	
3306 SWEENEY	SHARON K.	
3307 SWEENEY	WOODROW F.	
3308 SWEENEY	SHARON	
3309 SWEITZER	GEORGE	
3310 SWENSEN	GLENDA	
3311 SYKES	AUDREY	
3312 SZARSITO ?	DABORAH ?	
3313 SZEBIOSKO	ZOFIA	
3314 SZIGETHY	NEIL M.	
3315 SZOSTAK	LORRAINE J.	
3316 SZURA	BRIAN	
3317 SZUSZKOWSKI	ROBERT	
3318 SZWEC	FRANCES	
3319 SZWEC	ALICIA	
3320 SZYMANSKI	ILLEGIBLE	
3321 T ILLEGIBLE	GARY	
3322 TABOR	JOAN S.	
3323 TALARSHY	H.C.	
3324 TALLAKSEN	LESLIE	
3325 TAMBURRI ?	ROBERT	
3326 TARGZYNSKI	EDWARD	
3327 TARLOWE	PAUL A.	
3328 TARLOWE	PAUL	
3329 TARTASLIA	MARK	
3330 TATAR	MAUDE & JACK	
3331 TATYREK	ALFRED F.	
3332 TAYLOR	ALYCE P.	
3333 TAYLOR	STEVE	MANASQUAN RIVER WATERSHED ASSOC
3334 TAYLOR	DOROTHY	
3335 TEDESRO ?	N.	
3336 TEEPLE	FAITH	
3337 TENDLER	CATHERINE J.	
3338 TENNANT	JANICE G.	
3339 TEPLITE	DONA E.	
3340 TEPPERMAN	ELLIOTT	
3341 TEREK	RAYMOND	
3342 TERMINI	ROBERT/RITA	
3343 TETI ?	WILLIAM M/M	
3344 TETLOW	FRED	
3345 TEVO ?		
3346 THAERLY ?	MARLENE A.	
3347 THAKOR	LABHSHANKER V.	
3348 THALMANN	FRED	MADISON-CHATHAM JOINT MEETING
3349 THAPIE	MARC	
3350 THEODORE	MARY A.	
3351 THEOKRITOFF ?	GEORGE	
3352 THEUPEN	JANE E	

3353 THIEL	IRENE E.
3355 THOMAS	JACKIE
3354 THOMAS	JACKIE
3356 THOMPSON	MICHELE
3357 THOMPSON	ROBB
3358 THOMPSON	GWEN
3359 THOMPSON	STEVAN
3360 THOMPSON	PEGGY
3361 THOMSON	R.
3362 THONGIM	TEP
3363 THRONDSO	MARIAN
3364 THUNCO	SAMUEL J.
3365 THURSBY	J. W. & KATE M.
3366 TIGHE	DOLORES
3367 TILSON	BERNARD
3368 TILTON	RUSSEL G.
3369 TIMMONS	KAREN
3370 Tittle	Jeff
3371 TOCCO	TERI
3372 TOIA	JAMES
3373 TOMASINO	SARAH
3374 TOMCZUT ?	ARLEAE
3375 TOMKIEL	STANLEY
3376 TOMLIN	CHRIS
3377 TOMPKINS	TARA
3378 TOMPKINS	MARGARET A.
3379 TONDI	GREG
3380 TOPDJIAN	PHILIPPE
3381 TOPERZER	HELEN
3382 TORHAN	APRIL
3383 TORRES	JANET
3384 TOTH	SHERALD (MRS.)
3385 TOTH	EDWARD & CONSTANCE
3386 TOTTEN	LISA
3387 TOUSMAN	JANE
3388 TOZZI	JOHN
3389 TRACEY	ROSE V.
3390 TRACY	A. C.
3391 TRAMO	LINDA
3392 TRAMONTANO	JOSEPH J.
3393 TRAPP	THELMA
3394 TRAUTMAN	IRENE
3395 TRAVISANO	FRANCES
3396 TRIBER	ALTA A.
3397 TRIMMER	CHERYL
3398 TRITAK	CAROLE B.
3399 TRIZZINO	TIFFANY
3400 TROCHSLER	HELEN
3401 TRUSKIEWICZ	LYNNE & RITA
3402 TRUXAL	MAY
3403 TUCKER	BARBARA & CHARLES
3404 TULLMAN	JUNE
3405 TURIK	MARION
3406 TURNER	C. (MRS.)
3407 TURNER	B. GAZEY ?
3408 TUROCK	B.D.
3409 TURPAK	DOROTHY A.

3410 TURREEN, JR ?	L.	
3411 TYLER	GEORGE J.	TYLER & CARMELI, P.C.
3412 UCHIDA	NOBORU	
3413 UDY	SALLY M.	WOMAN'S CLUB OF WOODSTOWN
3414 UHRIG	LYNN R.	
3415 ULIANA	L.	
3416 UNGER	GIL	
3417 UNGER	JEAN & DAVID	
3418 UPHAM	PAUL	
3419 URBAN	ANTOINETTE	
3420 URBAN	LORENE	
3421 Usechak	Louise	Monmouth County League of Women Voters
3422 VALERI	ARMAND	
3423 VALLEE	NICHOLL	
3424 VALLONE	PERRY C.	K. HOVNANIAN COMPANIES
3425 VAN ABS	DANIEL J.	NJ WATER SUPPLY AUTHORITY
3426 VAN BRUNT	JOANN	
3427 VAN ENIGE	RICHARD	
3428 VAN HEESWYK	ANITA	
3429 VAN ILLEGIBLE	R.	
3430 VAN MIERT	DIANE	
3431 VAN ORDER	TANYA	
3432 VAN ROSSUM	MAYA K.	DELAWARE RIVER KEEPER NETWORK
3433 VAN SEGGERN	EDITH	
3434 VAN SYCKEL	DEIRDRE	
3435 VAN SYCKEL	DIANE	
3436 VAN VLIJMEN	MICHAEL B. M.	
3437 VAN VLIJMEN	SANDRA-LEE	
3438 VAN WAGNER	MARK P.	
3439 VAN WALLENDael	PETE	
3440 VAN ZEH ?	JOHN	
3441 VANDALEN	I.	
3442 VANDEGRIFT	DON	
3443 VANDEGRIFT	KATHLEEN	
3444 VANDERBECH	WILLIAM	
3445 VANDERGRIFT	CHARLES	
3446 VANDERVALK	CHARLOTTE	NEW JERSEY GENERAL ASSEMBLY
3447 VanHOUTEN	VALERIE	
3448 VARACALLI	FRAN	SOUTH BRANCH WATERSHED ASSOC
3449 VARANDAS	BELLE B.	
3450 VARES	MAURICE	
3451 VARGAS	WILLIAM R. & THERESA A.	
3452 VASATURE	LAURA	
3453 VATSKY	ART	
3454 VAUGHAN	JO	
3455 VECCHIA	VIVIANA DELLA	
3456 VENN	JOAN	
3457 VENTOLA	GEORGEANN	
3458 VENTZ-MIGNECO	DEBORAH J.	
3459 VERDY	SHARIE A.	
3460 VEREMEY	JULIE	
3461 VERMILYEN ?	A. MARIE	
3462 VERNON	S LAMAR	

3463 VERRE ?	MARIO A.
3464 VERRINE	JENNIFER
3465 VETTER	ALLISON
3466 VIECELLI	DEHLY
3467 VIEIRA-DAPONTE	MANUELA C.
3468 VIGGIANO	LORI
3469 VIK	CAROL H.
3470 VINCENT	SHIRLEY
3471 VINHAS	HELENA
3472 VINONIS ?	STEFANIA
3473 VIRGILIO	NICHOLAS
3474 VISUDER	ALMA/JOSEPH
3475 VIVIAN	V. EUGENE
3476 VIVILECCHIA	LINDA K.
3477 VIZZI	GREG
3478 VLIETSTRA	ROGER
3479 VLLMAN ?	S. G.
3480 VODOFSKY	ADAM
3481 VODOFSKY	MELISSA
3482 VOGEL	JOHN J.
3483 VOGEL	VERONICA L.
3484 VOLPE	ERIC
3485 VOLPE	ANN R.
3486 VON DREELE	ELIZABETH
3487 VON LUNON ?	ELIZABETH
3488 VONDERSCHMIDT	DON
3489 VOORHEES ENVIRONMENTAL COMMISSION	
3490 VOSS	ANNA
3491 VRABEL ?	JOHN & ELAINE
3492 VREELAND	LISA A.
3493 VROEGINDEWEY	JUNE
3494 W. ILLEGIBLE	M. ILLEGIBLE
3495 WADE	JAMES M.
3496 WADIA	JUDITH
3497 WAGNER	GLENN
3498 WAINWRIGHT	SCOTT
3499 WALD	DAWN
3500 WALD	GILBERT
3501 WALDEN	DONALD
3502 WALDMAN	KAREN
3503 WALKER	BETSY
3504 WALKER	MICHAEL
3505 WALKER	MOLLY V.
3506 WALKER	WILLIAM H.
3507 WALSH	MARY
3508 WALSH	BARBARA
3509 WALSH	SARAH C.
3510 WALSH	CAROLYN
3511 WALSH	LAURA
3512 WALTER	PERIANNE
3513 WALTZER	MARK
3514 WANNER	JILL
3515 WARD	JAMES A.
3516 WARD	DEBORAH L.
3517 WARD	JAMES/FRANCES
3518 WARHOLAK	MARTHA
3519 WARNER	ANNE J.

3520 WARNKIN	MEGAN	
3521 WARREN	SUZANNE	
3522 WARWICK	ALICIA	
3523 WASHBURN	STEPHEN T.	ENVIRON on behalf of Amtrack, Camden County MUA, DuPont, Exelon Power, Motiva Enterprises LLC, Occidental Chemical Corp., PSEG Services Corp., Rohm & Haas Co., Sunoco, Inc., and Valero Energy Corp.
3524 WASHINGTON	KATHLEEN A.	
3525 WASNIEWSKI	CAROL T.	
3526 WASYLYSZN ?	DEBRA	
3527 WATERS	WILLIAM	
3528 WATSON	DANIEL/MANDY/EUGENE	
3529 WATTORA ?	THOMAS H.	
3530 WAUGH	ANN E.	
3531 WAUGH	MARGARET H.	
3532 WAVERKA	WILLIAM & MINA	
3533 WEATHERS	MELISSA	
3534 WEAVER ?	TERRI	
3535 WEBB	JILL	
3536 WEBB/GUERIN	MARIA/KEITH J.	
3537 WEBER	WILLIAM E.	PULTE HOMES
3538 WEBER	ERIK	
3539 WEBER	ZORINA	
3541 WEEKS	JESSIE	
3540 WEEKS	JESSIE	
3542 WEEMS	CONSTANCE	
3543 WEIMER	JOAN & DAVID	
3544 WEINBERG	MURRAY	
3545 WEINER	WENDY	
3546 WEINER	ZELDA	
3547 WEINSTEIN	ANN	
3548 WEINSTEIN	LAURA	
3549 WEISBERG	DORIS M.	
3550 WEISBERGER	LINDA	
3551 WEISS	ED	
3552 WEISS	JONATHAN	
3553 WEISS	MARSHA & RUSS	
3554 WEISS	KATHY	
3555 WEISSENBURGER	A. WILLIAM	
3556 WELDON	AVIVA & KIP	
3557 WELKIN	ILLEGIBLE	
3558 WELLS	RONALD	CHUBB PERSONAL INSURANCE
3559 WELLS	ALLEN	
3560 WELLS	STEWART H.	
3561 WELLS	TIM	
3562 WENNER	WILBERT & BERIF C.	
3563 WENTINK	DIANNA	
3564 WENZEL	JEANNE	
3565 WERTH	NANCY	
3566 WESLEY	ANITA	
3567 WESMAN	MARTHA	
3568 WEST	KATHLEEN	
3569 WESTDYK	KARIN	
3570 WESTERVELT	WILLIAM	
3571 WESTHEIM	BRENDA	

3572 WESTHEIMER	JOSEPH	
3573 WESTPHALEN	JANET	
3574 WESTRA	MR/MRS GARY H.	
3575 WETMORE	SUSAN B.	
3576 WEYAND	MARY LIUISE	
3577 WEYTHMAN	MR/MRS JAMES E.	
3578 WHARTON	LENNARD	
3579 WHITE	SCOTT	
3580 WHITE	JOHN J.	
3581 WHITE	LESLIE C.	
3582 WHITE	VIRGINIA	
3583 WHITE	DAVID	
3584 WHITE	JACKIE	
3585 WHITEFORD	RICHARD	
3586 WHITEHEAD	TARYN	
3587 WHITELY	ROBIN L.	
3588 WHITMAN	BRIGETTE	
3589 WHITNEY	D.E.	
3590 WIEGAND	KEN	
3591 WIELER	SUSAN	
3592 WILCOX	KATHY	
3593 WILD-PERKOWSKI	PENNY	
3594 WILKINS	MR. & MRS.	
3595 Wilkinson	Eric	New Jersey Future
3596 WILLIA	B.	
3597 WILLIAMS	THERESA	
3598 WILLIAMS	DOUG	
3599 WILLIAMS	RICHARD H.	
3600 WILLIAMSON	DAN	
3601 WILLIAMSON	LARA	
3602 WILLIS	MELISSA	
3603 WILLSKY ?	RHODA	
3604 WILMORE	EVE	
3605 WILSON	LISA	
3606 WILSON	GEORGE & AVICE	
3607 WILSON	LAWRENCE W.	
3608 WILSON	WILLIAM E.	
3609 WILSON	MICHAEL	
3610 WILSON	RALPH	
3611 WINEBURGH	CAROLEE	
3612 WINGET	D. BRIAN	
3613 WINSTEAD	DAWN	
3614 WINTERHALDER	CARL O.	
3615 WISDELY ?	LAURA	
3616 WISDOM	MAGGIE	
3617 WISE	LORETTA	
3618 WISHNIE	BILL	
3619 WITKOWSKI	SUSAN P.	
3620 WITKOWSKI	MARION	
3621 WITONSKY	LOUISE	
3622 WOHLLEBEN	ARLENE	
3623 WOJAK ?	DOUGLAS E.	
3624 WOLICE	PETER C.	
3625 WOLOCK	MELVIN/ISABEL	
3626 WOMER	DAVID	
3627 WOOD	PATRICIA	WOMAN'S CLUB OF CRANBURY
3628 WOOD	FAMILY	

3629 WOOD	EDWARD & MARION	
3630 WOOD	JEAN N.	
3631 WOOD	NORMA	
3632 WOOD	GARY	
3633 WOODFIN	KAREN F.	
3634 WOODNORTH	S.	
3635 WOODUFF	CATHY	
3636 WOODUFF	W.	
3637 WOR ?	SUFE	
3638 WORTGEL	DONNA	
3639 WOZNIAK	EILEEN	
3641 WRIGHT	JEFFREY A.	
3642 WRIGHT	ILLEGIBLE	
3643 WRIGHT	MAUREEN	
3644 WRIGHT	CHLOE	
3640 WRIGHT	MIRIAM S.	
3645 WUGBY	W. M.	
3646 WYSESSION	ALEX	
3647 YACNO ?	CHERYLE ?	
3648 YAFET	YAKO	
3649 YANKOWSKI	DEBORAH	
3650 YAPIJAKIS	CONSTANTINE	
3651 YAPIJAKIS	COSTASW	
3652 YAVELOW	JONATHAN	
3653 YAXLEY	NONA G. L.	
3654 YOUNG	HELENE	
3655 YOUNG	JOAN E.	
3656 YOUNG	TRACY	
3657 YOURTH	MARIANNE	
3658 YUHAS	EDWARD	
3659 YUNO	JOHN	
3660 YURKANIN	SISTER JANET	
3661 ZACH	MYRNA	
3662 ZACHARY	RICHARD	
3663 ZADIS	PETER	
3664 ZAGNIT	BARRY H.	BOROUGH OF SPOTSWOOD
3665 ZALUSKA	SANDRA	
3666 ZAMORSKI	ESTHER	
3667 ZAPPICHENI	JULIET	
3668 ZATKOW	BRUCE	
3669 ZAVADA	MARLENE	
3670 ZAVOGLIN	JAMES	
3671 ZAWOYSKY	RUSSELL	
3672 ZEBROWSKI	MARY A.	
3673 ZEHLER ?	C.	
3674 ZEILMEIER	JOSEF	
3675 ZELCH	EUGENE S.	
3676 ZELENAK	MICHAEL	
3677 ZELINSKI	MARY & JONAS	
3678 ZELTIN ?	ILLEGIBLE	
3679 ZEMAN	CHRISTOPHER	
3680 ZERBE	FAITH	
3681 ZETTERSTROM	SHARON	
3682 ZHANG	JOAN	
3683 ZHOU	JING	
3684 ZIMMERMAN	CAROLE	
3685 ZIMMERMAN	PATRICIA	

3686 ZIMMERMAN
3687 ZIMMERMAN
3688 ZIPF
3689 ZOERNER
3690 ZORNESKKY
3691 ZUMBRUNN
3692 DiLodovico
3693 MATARAZZO

PATRICIA J.
VIRGINIA
CINDY
GAIL A.
JERONE
KAREN F.
TONY
PAT

CLEAN OCEAN ACTION

Schoor DePalma
Clean Water Council